

BASELINE ENVIRONMENTAL ASSESSMENT CONDUCTED PURSUANT TO SECTION 20126(1)(C) OF 1994 PA 451, PART 201, AMENDED, AND THE RULES PROMULGATED THEREUNDER

FOR

CHESTER LIMITED III, LLC 2654 20TH STREET PORT HURON, MICHIGAN

JULY 10, 2014

Prepared for: Chester Limited III, LLC 2605 Highwinds Lane Oakland, Michigan 48636

With Support from: St. Clair County Brownfield Redevelopment Authority 200 Grand River, Suite 202 Port Huron, Michigan

Prepared by:

ENVIROLOGIC TECHNOLOGIES, INC.

2960 Interstate Parkway Kalamazoo, Michigan 49048 (269) 342-1100



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY – REMEDIATION AND REDEVELOPMENT DIVISION PO BOX 30426, LANSING, MICHIGAN 48909-7926, Phone 517-284-5087, Fax 517-241-9581

| FOR DEQ USE ONLY |
|------------------|
| BEA SUBMITTAL # |
| |
| |

Baseline Environmental Assessment Submittal Form

This form is for submittal of a Baseline Environmental Assessment (BEA), as defined by Part 201, Environmental Remediation and Part 213, Leaking Underground Storage Tanks, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, for the purpose of establishing an exemption to liability pursuant to Section 20126(1)(c) and Section 21323a(1)(b) for a new owner or operator of property that is a facility as defined by Section 20101(1)(s) or Property as defined by Section 21303(d). The BEA report must be conducted either prior to or within 45 days after becoming the owner or operator, whichever is earliest. This form and the BEA report must be submitted within 6 months of becoming the owner or operator whichever is earliest. A separate BEA is required for each legal entity that is or will be a new owner or operator of the property. To maintain the exemption to liability, the owner and operator must also disclose the BEA to any subsequent purchaser or transferee before conveying interest in the property pursuant to Section 20126(1)(c) and Section 21323a(1)(b). An owner or operator of a facility or Property also has due care obligations under Section 20107a and Section 21304c with respect to any existing contamination to prevent unacceptable exposure; prevent exacerbation; take reasonable precautions; provide reasonable cooperation, assistance, and access to authorized persons taking response activities at the property; comply with land use restrictions associated with response activities; and not impede the effectiveness of response activities implemented at the property. Documentation of due care evaluations and response activities need to be available, but not submitted, to the DEQ within 8 months of becoming the owner or operator of a facility.

| Section A: Legal Entity Information | | | | | | | |
|--|---|--|--|--|--|--|--|
| Name of legal entity that will own or operate the property: Chester Limited III, LLC Address: 2605 Highwinds Ln City: Oakland State: MI Zip: 48363 | Contact for BEA questions if different from submitter Name & Title: David Stegink, Associate Vice President Company: Envirologic Technologies, Inc. | | | | | | |
| Contact person (Name & Title): Jeffrey S. Sheehan, Managing Member | Address: 2960 Interstate Parkway City: Kalamazoo State: MI Zip: 49048 Telephone: 269-342-1100 | | | | | | |
| Telephone: 313-363-1336 E-Mail: Jeffrey.Sheehan@johnstonesupply.com | E-Mail: dstegink@envirologic.com | | | | | | |
| Section B: Property Information | | | | | | | |
| Street Address of Property: 2654 20 th Street | County: St. Clair County | | | | | | |
| | City/Village/Township: City of Port Huron | | | | | | |
| City: Port Huron State: MI Zip: 49328 Property Tax ID (include all applicable IDs): 06-182-0047-000 | Town: 6N Range: 17E Section: 16 Quarter: SE Quarter-Quarter: NW | | | | | | |
| Address according to tax records, if different than above (include all applicable addresses): | Decimal Degrees Latitude: 42.954065 N Decimal Degrees Longitude: -82.445365 W | | | | | | |
| City: State: Zip: Status of submitter relative to the property (check all that apply): | Reference point for latitude and longitude: Center of site Main/front door Front gate/main entrance Other | | | | | | |
| Former Current Prospective Owner Operator | Collection method: Survey ☐ GPS ☐ Interpolation ☒ | | | | | | |
| Section C: Source of contamination at the property (check all that a | | | | | | | |
| Facility regulated under Part 201, other source, or source unknown Part 201 Site ID, if known: | n 🗵 | | | | | | |
| Leaking Underground Storage Tank regulated pursuant to Part 21 Part 211/213. Facility ID, if known: | 3 | | | | | | |
| Oil or gas production and development regulated pursuant to Part | 615 or 625 | | | | | | |
| Licensed landfill regulated pursuant to Part 115 | | | | | | | |
| Licensed hazardous waste treatment, storage, or disposal facility regulated pursuant to Part 111 | | | | | | | |
| Section D: Applicable Dates (provide date for all that are relevant): | MM/DD/YYYY | | | | | | |
| Date All Appropriate Inquiry (AAI) Report or Phase I Environmenta | | | | | | | |
| Date Baseline Environmental Assessment Report conducted: 07/10/2014 | | | | | | | |
| TOTAL SOCIAL APPLICATION OF THE PROPERTY OF TH | Date submitter first became the owner: | | | | | | |
| Date submitter first became the operator (if prior to ownership): | 00/04/0044 | | | | | | |
| Anticipated date of becoming the owner for prospective owners: (| J9/01/2014 | | | | | | |

| | icipated date of becoming the operator for prospective ormer owner or operator of this property, prior dates of | | | | | | |
|--|---|--|------------------|----------------|--|--|--|
| Sec | tion E: Check the appropriate response to each of the f | following questions: | YES | NO | | | |
| | Is the property at which the BEA was conducted a "fa Property as defined by Section 21303(d)? | | | | | | |
| 2. | Is the All Appropriate Inquiry (AAI) compliant with 40 Assessment compliant with ASTM E1527-05? | CFR 312, or is the Phase I Environmental | \boxtimes | | | | |
| 3. | Was the BEA, including the AAI and sampling, condubecoming the owner, operator, or of foreclosure, which | | | | | | |
| 4. | Is this BEA being submitted to the department within or operator, or foreclosing? | 6 months of the submitter first becoming the owner | \boxtimes | | | | |
| 5. | 5. Does the BEA provide sufficient rationale to demonstrate that the data are reliable and relevant to define conditions at the property at the time of purchase, occupancy, or foreclosure, even if the BEA relies on studies of data prepared by others or conducted for other purposes? | | | | | | |
| 6. | Does this BEA contain the legal description of the pro | operty addressed by the BEA? | \boxtimes | | | | |
| 7. Does this BEA contain the environmental analytical results, a scaled map showing the sample locations, and the basis for the determination that the property is a facility as defined by Section 20101(1)(s) or the basis for the determination that the property is a Property as defined by Section 21303(d)? | | | | | | | |
| Sec | tion F: Environmental Consultant Signature: | | | | | | |
| cei Ap and as an BE | I certify to the best of my knowledge and belief, that this BEA and all related materials are true, accurate, and complete. I certify that an All Appropriate Inquiry (AAI) was conducted in conformance with the scope and limitations of the All Appropriate Inquiry Rule, 40 CFR 312 or a Phase I Environmental Site Assessment (Phase I) in conformance with the scope and limitations of the ASTM E1527-05. I certify that the property is a facility as defined by Section 20101(1)(s) or a Property as defined by Section 21303(d) and have provided the sampling and analyses that support that determination. I certify that any exceptions to, or deletions from, the All Appropriate Inquiry Rule or ASTM E1527-05 are described in Section 1 of the BEA report. Signature: Date: Date: | | | | | | |
| Pri | nted Name: David A. Stegink | | | | | | |
| Со | mpany: Envirologic Technologies, Inc. | | | | | | |
| Ма | ling Address: 2960 Interstate Parkway | City: Kalamazoo State: MI | Zip: 4904 | 8 | | | |
| Те | ephone: 269-342-1100 | E-Mail: dstegink@envirologic.com | | | | | |
| | etion G: Legal Entity Signature: | and the second belief this DEA and all related metalic | la ana tun | | | | |
| ac | h my signature below, I certify that to the best of my known and complete. nature: (Person legally authorized to bind the legal entity) | Date: 7/24/2014 | is are true | 7 , | | | |
| Pri | nted Name: Jeffrey S. Sheehan | | | | | | |
| Titl | e and Relationship of signatory to submitter: Managin | g Member | | | | | |
| Ad | dress: 2605 Highwinds Ln | City: Oakland State: MI Zi | p: 48363 | | | | |
| Te | ephone: 313-363-1336 | E-Mail: Jeffrey.Sheehan@johnstonesupply.com | ı | | | | |

Submit the BEA report and this form to the DEQ District Office for the county in which the property is located. A district map is located at www.michigan.gov/remediation.

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1. INTRODUCTION AND DISCUSSION

A. Owner/Operator Information

| Current Owner: | |
|--|--|
| WES Management Company PO Box 5006 Port Huron, MI 48061 | |
| Prospective Owner: | Prospective Operator: |
| Chester Limited III, LLC 2605 Highwinds Ln Oakland, MI 48363 | Chester Limited III, LLC 2605 Highwinds Ln Oakland, MI 48363 |

B. Intended Use of Property

The current building will be used in order to house a new branch for the wholesale of heating, ventilation, air conditioning, and refrigeration equipment.

There are no planned redevelopment activities for the site that would alter surface or subsurface conditions or stormwater systems.

C. Phase I ESA Summary - Recognized Environmental Conditions

On May 21, 2014, ASTI Environmental (ASTI) completed a Phase I Environmental Site Assessment (ESA) (ASTM E1527-13) of the above referenced subject property. The following Recognized Environmental Conditions (RECs) and potential Vapor Encroachment Condition (pVEC)were identified:

- The subject building was constructed in 1967 and used as a stamping facility through 1973 that cooled rolled steel in quenching oil. The storage, handling, and disposal practices related to the quenching oil is not known and machine pits may have been present.
- The north portion of the original shop including the AC room and area east to the addition contained several foundation scars as the result of machining operations. Significant staining was present in one area entering a cracked area in the foundation. The foundation breaches and staining represent a REC.
- The compressor room was heavily stained and staining was noted on the east exterior wall
 of the room.

A groundwater plume containing metals and solvents was identified to the south of the
property. Solvent soil impacts were also identified to the east of the property. These
impacts are the result of former automotive parts manufacturing operations on the south
adjoining 1721 Dove St. and east adjoining 2655 16th St. sites. The extent of the
groundwater plume is not known and the identified offsite impacts also represent a pVEC.

D. Exceptions/Deletions from ASTM 1527-05

No exceptions to or deletions from the ASTM 1527-13 Phase I ESA standard have been identified.

E. Phase I ESA Data Gaps Discussion

A data gap is the inability to obtain information within the scope of the Phase I ESA. The inability to interview prior owners is considered a data gap. However, this does not constitute a REC because information from other sources provided sufficient information regarding past use.

A data failure is the absence of information typically used to complete a Phase I ESA. No data failures were encountered for the Phase I ESA.

F. Sampling Discussion – Purpose/Methods

A Phase II ESA was conducted at the subject property on June 18 and 19, 2014. The investigation included the installation of six GeoProbe soil borings (GSB-1 through GSB-6) and three temporary monitoring wells (TMW-1 through TMW-3) at selected locations across the site. Soil samples were collected at each boring location and groundwater samples were collected from each temporary monitoring well in order to investigate the RECs identified for the subject property. The borings were advanced to a depth of approximately 10 feet below ground surface (bgs).

Soils were screened for organic vapors with a photoionization detector (PID). Low PID responses (<6.8 ppm) were identified in TMW-1 and TMW-2 near the surface of the water table; however, no other borings exhibited a PID response. Based on site use history, one soil sample was collected at two feet bgs from each boring in order to characterize near surface impacts. Soil samples were collected for analysis of volatile organic compounds (VOCs, USEPA Method 8260+), polynuclear aromatic hydrocarbons (PNAs, USEPA Method 8270), and Michigan 10 metals.

Soils encountered during boring installation were similar in type and depth throughout the site. At indoor locations (GSB-5 and GSB-6), six inches of foundation concrete was cored through before soils were encountered. Beneath foundations concrete, sand construction fill material was encountered to the base of the boring. At the remaining boring locations, typically three inches of topsoil was encountered at the surface. Beneath the topsoil, sand with varying amounts of silt

and clay was encountered until the base of the boring. Groundwater saturation was encountered between five and 7.5 feet bgs.

Three temporary one-inch-diameter PVC monitoring wells with five-foot-long screens were installed at boring locations TMW-1, TMW-2, and TMW-3 throughout the vacant eastern portion of the property. The well screen was positioned across the groundwater surface as observed during boring installation. Groundwater samples were collected from each temporary monitoring well for analysis of VOCs (USEPA Method 8260+). Groundwater samples were collected in laboratory prepared 40-mL vials preserved with hydrochloric acid and placed on ice. Following the collection of groundwater samples, temporary monitoring wells were abandoned, and borings were backfilled with hydrated bentonite.

The results of the investigation were presented in the Phase II ESA of the subject property, included in Section 6 of this BEA.

G. Known Contamination – Locations and Environmental Media

Soil

Several metals were detected in soil samples collected at two feet bgs. In soil sample GSB-2@2', arsenic, barium, cadmium, copper, lead, selenium, silver, zinc, and mercury were detected at concentrations exceeding Residential Drinking Water Protection Criteria, Groundwater Surface Water Interface Protection Criteria, Direct Contact Criteria, or all three. Lead analysis was conducted for the "fine fraction" (defined as particles less than 250 microns in size) of soil sample GSB-2@2'; the "fine fraction" concentration exceeded Direct Contact Criteria. The VOC 1,4-dichlorobenzene was detected at a concentration greater than Residential Drinking Water Protection Criteria and the Groundwater Surface Water Interface Protection Criteria. In soil sample GSB-5@2' mercury was detected at a concentration exceeding Groundwater Surface Water Interface Protection Criteria.

PNAs were identified in several soil samples; however, GSB-1@2' was the only soil sample with PNAs which exceeded Generic Residential Cleanup Criteria. In soil sample GSB-1@2' benzo(a)anthracene, dibenzo(a,h)anthracene, and phenanthrene exceeded Groundwater Surface Water Interface Protection Criteria, Direct Contact Criteria, or both.

Groundwater

VOCs were identified in the groundwater sample TMW-2@4-9', collected from temporary monitoring well TMW-2. The target compound chlorobenzene exceeded the Groundwater Surface Water Interface Criteria.

H. "Facility" Demonstration

The subject property (2654 20th St., Port Huron, Michigan; Tax ID: 06-182-0047-000) is identified as a "facility" based on the detection of the following contaminants in soil and groundwater during the Phase II ESA:

| | | Gre | oundwater |
|---------|---------------------|--------|---------------|
| Soi | l Contaminants | Coi | ntaminants |
| CAS | Compound | CAS | Compound |
| 7440382 | Arsenic | 108907 | Chlorobenzene |
| 7440393 | Barium | | |
| 7440439 | Cadmium | | |
| 7440508 | Copper | | |
| 7439921 | Lead | | |
| 7782492 | Selenium | | |
| 7440224 | Silver | | |
| 7440666 | Zinc | | |
| 7439976 | Mercury | | |
| 106467 | 1,4-dichlorobenzene | | |
| 50328 | Benzo(a)pyrene | | |
| 206440 | Fluoranthene | | |
| 85018 | Phenanthrene | | |

The identification of VOCs, PNAs, and metals in soil and groundwater at concentrations in excess of Generic Residential Cleanup Criteria demonstrates that the subject property meets the definition of a "facility" as defined by Part 201 of NREPA. A site plan showing the location and concentration of "facility" contaminants is presented in Figure 2 below.

2. PROPERTY INFORMATION

A. Property Legal Description

The property subject to this Baseline Environmental Assessment consists of one legal parcel occupying approximately 3.64 acres of land. The tax identification number and legal description for the parcel:

2654 20th Street, Port Huron, Michigan – Parcel I.D. # 06-182-0047-000 N 250 FT OF S 850 FT OF E 634.61 FT OF W 667.61 OUTLOT A ASSESSOR'S TWENTY-FOURTH STREET PLAT

The approximate boundary of the subject parcel is presented on Figure 1 below.

B. Survey Map, Property Tax Identification Number(s)

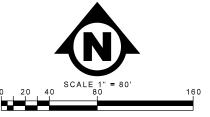
The land subject to this Baseline Environmental Assessment consists of Parcel 06-182-0047-000 as described in the above section.

A scaled site map detailing the boundary of the parcel and tax identification number is presented in Figure 1 below.



LEGEND

- GEOPROBE SOIL BORING LOCATION
- TEMPORARY MONITORING WELL LOCATION



NOTE:
THIS IS NOT A PROPERTY BOUNDARY SURVEY, PROPERTY BOUNDARIES SHOWN ON THIS MAP
ARE BASED ON AVAILABLE FURNISHED INFORMATION AND ARE APPROXIMATE ONLY AND
SHOULD NOT BE USED TO ESTABLISH PROPERTY BOUNDARY LOCATION IN THE FIELD.

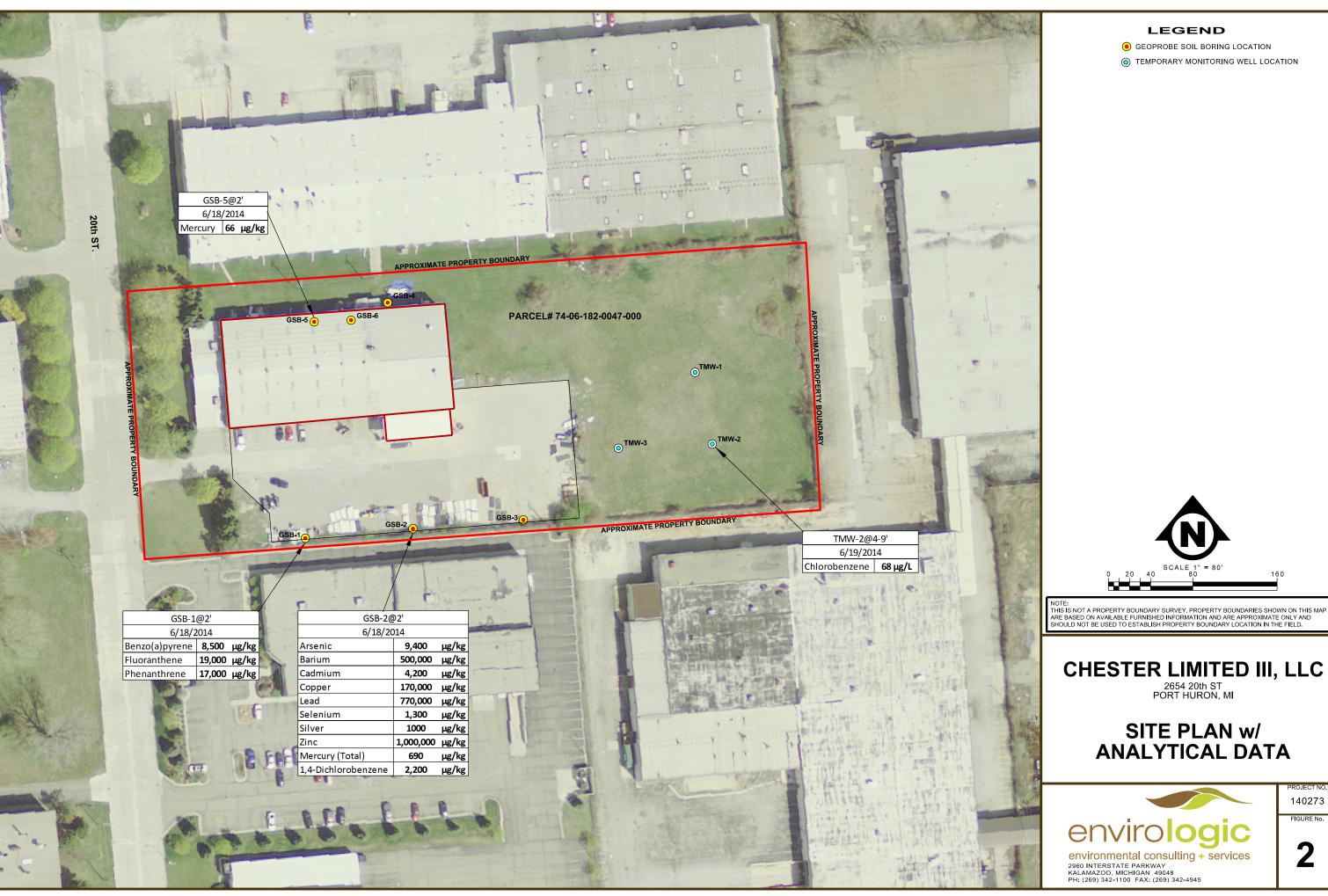
CHESTER LIMITED III, LLC 2654 20th ST PORT HURON, MI

SITE PLAN



140273 FIGURE No.

C. Site Map with Sampling Results – Figure 2



LEGEND

GEOPROBE SOIL BORING LOCATION

(iii) TEMPORARY MONITORING WELL LOCATION



NOTE:
THIS IS NOT A PROPERTY BOUNDARY SURVEY, PROPERTY BOUNDARIES SHOWN ON THIS MAP
ARE BASED ON AVAILABLE FURNISHED INFORMATION AND ARE APPROXIMATE ONLY AND
SHOULD NOT BE USED TO ESTABLISH PROPERTY BOUNDARY LOCATION IN THE FIELD.

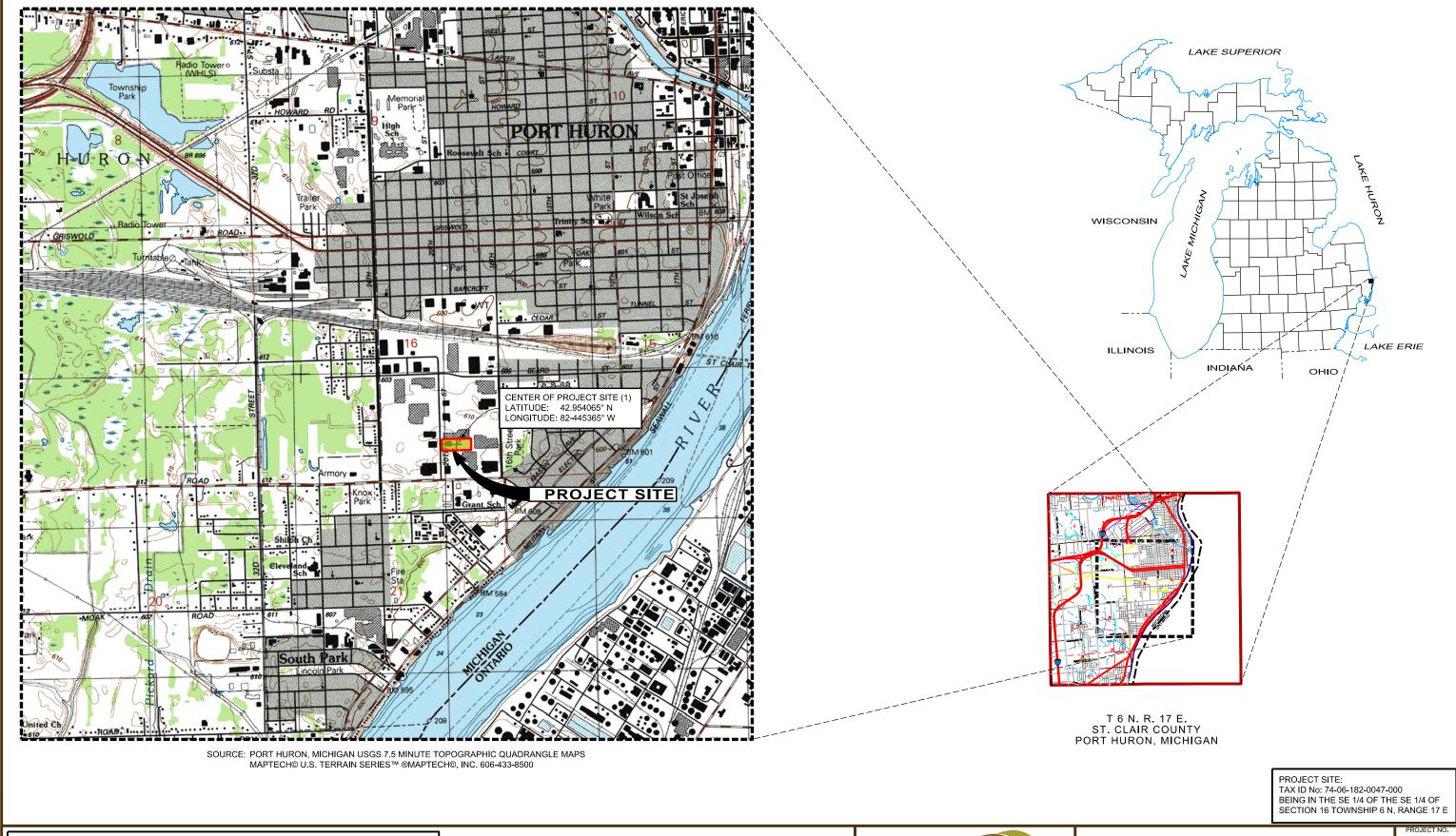
SITE PLAN w/ **ANALYTICAL DATA**



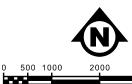
140273 FIGURE No.

environmental consulting + services 2960 INTERSTATE PARKWAY KALAMAZOO, MICHIGAN 49048 PH: (269) 342-1100 FAX: (269) 342-4945

D. Location Map – Figure 3



NOTES: (1) LATITUDE AND LONGITUDE INTERPOLATED USING CAD SOFTWARE WITH GEOGRAPHIC CAPABILITIES SET TO THE MICHIGAN GEOREF SYSTEM PROJECTION, AND NATIONAL AGRICULTURAL IMAGERY PROGRAM (NAIP) 2005 GEOREFERENCED IMAGERY OBTAINED FROM THE MICHIGAN GEOGRAPHIC DATA LIBRARY.



SCALE 1" = 2000



CHESTER LIMITED III, LLC

2654 20th ST. PORT HURON, MI

LOCATION MAP

PROJECT NO.

140273

FIGURE No.

3

E. Property Location

The subject property is located at 2654 20th St., Port Huron, Michigan. The property location is depicted on Figure 3 above.

F. Spatial Data

Table 1 – Spatial Data

| County | City/Village/ Township | Town | Range | Section | Quarter | Quarter/Quarter | Latitude | Longitude |
|-----------|---------------------------|------|-------|---------|---------|-----------------|-------------|--------------|
| St. Clair | Port Huron | 6N | 17E | 16 | SE | NW | 42.954065 N | -82.445365 W |

Latitude and longitude information obtained from Google Earth and are referenced to the approximate center of the site.

3. FACILITY STATUS

A. Analytical Table

Table 2 provides a summary of the "facility" contaminants identified in the Phase II ESA:

Table 2: Summary of "Facility" Contaminants

| Hazardous Substance | CAS Number | Maximum Concentration | Sample Location and Depth | Media Affected |
|------------------------|------------|--------------------------|---------------------------------|----------------|
| Arsenic | 7440382 | 9400 μg/kg | GSB-2@2' | Soil |
| Barium | 7440393 | 500000 μg/kg | GSB-2@2' | Soil |
| Cadmium | 7440439 | 4200 μg/kg | GSB-2@2' | Soil |
| Copper | 7440508 | 170000 μg/kg | GSB-2@2' | Soil |
| Lead | 7439921 | 770000 μg/kg | GSB-2@2' | Soil |
| Selenium | 7782492 | 1300 μg/kg | GSB-2@2' | Soil |
| Silver | 7440224 | 1000 μg/kg | GSB-2@2' | Soil |
| Zinc | 7440666 | 1000000 μg/kg | GSB-2@2' | Soil |
| Mercury | 7439976 | 690 μg/kg | GSB-2@2' | Soil |
| 1,4-Dichlorobenzene | 106467 | 2200 μg/kg | GSB-2@2' | Soil |
| 1,4-Dichlorobenzene | 106467 | 68 μg/L | TMW-2@4-9 | Groundwater |
| Benzo(a)pyrene | 50328 | 8500 μg/kg | GSB-1@2' | Soil |
| Fluoranthene | 206440 | 19000 μg/kg | GSB-1@2' | Soil |
| Phenanthrene | 85018 | 17000 μg/kg | GSB-1@2' | Soil |

B. Laboratory Analytical Data Sheets and Chain of Custody

A copy of the Phase II ESA by Envirologic (dated July 10, 2014), which includes the results of the site investigation as well as laboratory analytical reports and chain of custody documentation is included with this BEA in Section 6.

4. IDENTIFICATION OF THE AUTHOR OF THE BEA

The following individuals have conducted this Baseline Environmental Assessment.

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in §312.10 of this part. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history and setting of the subject property. We have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR 312.

David A. Stegink

Senior Environmental Scientist – Associate Vice President

DavdA. Sterr-

David A. Stegink graduated from Hope College with a Bachelor of Science degree in Chemistry/Biology and has over 29 years of environmental related experience. He has been an Environmental Compliance Manager for Envirologic since 1991. Between 1984 and 1991, Mr. Stegink served as a Chemist and Operations Manager for a commercial hazardous waste treatment facility. His expertise includes transactional environmental liability, property assessments including Phase I and II ESAs, Baseline Environmental Assessments, hazardous waste management, underground storage tanks, stormwater management, and environmental policy and regulations.

Dean G. Hazle

Project Geologist/Scientist

Dean G. Hazle worked under the supervision of Mr. Stegink. Mr. Hazle holds a Bachelor of Science degree in Geology from Hope College. His experience with Envirologic has concentrated on the areas of hydrogeological investigations and Phase II Environmental Site Assessments.

Envirologic Technologies, Inc. 2960 Interstate Parkway Kalamazoo, Michigan 49048 (269) 342-1100

5. ASTM 1527-05 PHASE I ENVIRONMENTAL SITE ASSESSMENT

Phase I Environmental Site Assessment 2654 20th Street Port Huron, Michigan

Chester Limited III, LLC

May 21, 2014

ASTI ENVIRONMENTAL







Investigation • Remediation Compliance • Restoration

10448 Citation Drive, Suite 100 Brighton, MI 48116

Mailing Address: P.O. Box 2160 Brighton, MI 48116-2160 800 395-ASTI Fax: 810.225.3800

www.asti-env.com

RELIANCE LETTER

May 21, 2014

To: Oakland County Business Finance Corporation 2100 Pontiac Lake Rd, Bldg. 41W Waterford MI 48328 and

U.S. Small Business Administration ("SBA")

Re: Borrower Name: Chester Limited III, LLC
Project Address ("Property"): 2654 20th Street
Environmental Investigation Report Number(s): 8745

Dear Lender and SBA:

| | onal as defined by 40 C.F.R. § 312.10(b) and has performed the following mental Investigation(s)": |
|--------------|---|
| | A Transaction Screen of the Property dated, 20, onducted in accordance with ASTM International's most recent standard currently ASTM E1528-06); |
| P Ir E | X_An Phase I (or an Updated Phase I) Environmental Site Assessment of the roperty dated May 21, 2014, conducted in accordance with ASTM ternational's most recent standard (currently ASTM E1527-13). In addition, the nvironmental Professional has addressed the performance of the "additional quiries" set forth at 40 C.F.R. § 312.22; |
| C | A Phase II Environmental Site Assessment of the Property dated, 20, conducted in accordance with generally-accepted dustry standards of practice and consisting of a scope of work that would be ensidered reasonable and sufficient to identify the presence, nature and extent a Release as it impacts the Property. |

Carey Kratz ("Environmental Professional") meets the definition of an Environmental

Reliance by SBA and Lender. Environmental Professional and ASTI Environmental understand(s) that the Property may serve as collateral for an SBA guaranteed loan, a



condition for which is an Environmental Investigation of the Property by an Environmental Professional. Environmental Professional and ASTI Environmental authorize(s) Lender and SBA to use and rely upon the Environmental Investigation. Further, Environmental Professional and ASTI Environmental authorize(s) Lender and SBA to release a copy of the Environmental Investigation to the borrower for information purposes only. This letter is not an update or modification to the Environmental Investigation. Environmental Professional and ASTI Environmental makes no representation or warranty, express or implied, that the condition of the Property on the date of this letter is the same or similar to the condition of the Property described in the Environmental Investigation.

Insurance Coverage. Environmental Professional and/or ASTI Environmental certifies that he or she or the firm is covered by errors and omissions liability insurance with a minimum coverage of \$1,000,000 per claim (or occurrence) and that evidence of this insurance is attached. As to the Lender and SBA, Environmental Professional and ASTI Environmental specifically waive(s) any dollar amount limitations on liability up to \$1,000,000.

<u>Waiver of Right to Indemnification.</u> Environmental Professional and Environmental Professional's firm waive any right to indemnification from the Lender and SBA.

Impartiality. Environmental Professional certifies that (1) to the best of his or her knowledge, Environmental Professional is independent of and not a representative, nor an employee or affiliate of seller, borrower, operating company, or any person in which seller has an ownership interest; and (2) the Environmental Professional has not been unduly influenced by any person with regard to the preparation of the Environmental Investigation or the contents thereof.

<u>Acknowledgment</u>. The undersigned acknowledge(s) and agree(s) that intentionally falsifying or concealing any material fact with regard to the subject matter of this letter or the Environmental Investigations may, in addition to other penalties, result in prosecution under applicable laws including 18 U.S.C. § 1001.

Environmental Professional Printed Name: Carev Kratz

Leonge Kandler

Signature of representative of firm who is authorized to sign this letter

Printed Name & Title: George Kandler
Name of Environmental Firm: Vice President

Enclosure: Evidence of Insurance



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY) 9/13/2013

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to

| | | | | | ns of the polic I of such endo | | | policies may require an e i). | ndors | ement. A st | atement on t | his certificate doe | s not co | nfer | rights to the |
|-------------|---|-----------------------------|--|----------------|-----------------------------------|--------------|---------------|--|--|------------------|----------------------------|---|---|---|---|
| | DUC | | | | | | | <i>r</i> | CONTACT Daly-Merritt, Inc. | | | | | | |
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Phase I Environmental Site Assessment 2654 20th Street Port Huron, Michigan

May 21, 2014

Report Prepared For:

Chester Limited III, LLC 12800 Lyndon Street Detroit, Michigan 48226

Report Prepared By:

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ASTI Project No. 8745

Report Prepared by:

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Manager - Phase I ESAs

Report Reviewed by:

George Kandler, CHMM, EP

Managing Director



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Executive Summary

ASTI Environmental (ASTI) was retained by Jeffrey Sheehan on behalf of Chester Limited III, LLC to conduct a Phase I Environmental Site Assessment (ESA) of 2654 20th Street in Port Huron, St. Clair County, Michigan (Property). The Phase I ESA was conducted in accordance with the United States Environmental Protection Agency (US EPA) Standards and Practices for All Appropriate Inquiries (AAI) and ASTM Practice E1527-13. The information and opinions rendered in this report are exclusively for reliance by Chester Limited III, LLC, Jeffrey Sheehan, Comerica Bank, and US Small Business Administration.

| Property Overview | | | |
|---|---|--|--|
| Location/Address 2654 20th Street, Port Huron, St. Clair County, Michigan | | | |
| Parcels and Acreage 06-182-0047-000; 3.64 acres | | | |
| Current Use | Current Use Wirtz - Manufacturer of battery manufacturing equipment | | |

The Phase I ESA included (1) a site inspection on May 6, 2014, (2) interviews with knowledgeable site contacts, (3) review of pertinent Michigan Department of Environmental Quality (DEQ), Department of Licensing and Regulatory Affairs, Port Huron, and St. Clair County records, (4) acquisition and review of a federal and state database search, and (5) review of historical aerial photographs and city directories. Below is a summary of our opinion representing the findings of this Phase I ESA.

De Minimis Conditions

De minimis conditions are conditions that do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate government agencies. Conditions determined to be de minimis are not RECs. ASTI did not identify de minimis conditions associated with the Property.

Historic Recognized Environmental Conditions (HRECs)

A historical REC is defined as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. HRECs are not considered to be RECs. ASTI did not identify any HRECs associated with the Property.

Controlled Recognized Environmental Conditions (CRECs)

A controlled recognized environmental condition is a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. ASTI did not identify any CRECs associated with the Property.



Recognized Environmental Conditions (RECs)

A recognized environmental condition is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. The term is not intended to include de minimis conditions.

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-13 of 2654 20th Street in Port Huron, St. Clair County, Michigan, referred to as the "Property". Any exceptions to, or deletions from, this practice are described in Section 1.4 of this report. This assessment has revealed no evidence of recognized environmental conditions (RECs) in connection with the Property, except for the following.

- 1. The subject building was constructed in 1967 and used as a stamping facility through 1973 that would cool rolled steel in quenching oil. The storage, handling, and disposal practices related to the quenching oil is not known and machine pits may have been present (see REC #2).
- 2. The north portion of the original shop including the AC room and area east to the addition contained several foundation scars the result of machining operations. Significant staining was present in one area entering a cracked area in the foundation. The foundation breaches and staining represent a REC.
- 3. The compressor room was heavily stained and staining was noted on the east exterior wall of the room.
- 4. A groundwater plume containing metals and solvents was identified to the south of the Property. Solvent soil impacts were also identified to the east of the Property. These impacts are the result of former automotive parts manufacturing operations on the south adjoining 1721 Dove and east adjoining 2655 16th Street sites. The extent of the groundwater plume is not known and the identified off-site impacts also represent a pVEC.



1.0 Introduction

ASTI Environmental (ASTI) was retained by Jeffrey Sheehan on behalf of Chester Limited III, LLC to conduct a Phase I Environmental Site Assessment (ESA) of 2654 20th Street in Port Huron, St. Clair County, Michigan (Property). The Phase I ESA was conducted in accordance with the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E1527-13) and 40 CFR Part 312: Standards and Practice for All Appropriate Inquiries; Final Rule (AAI).

1.1 Purpose

The assessment was conducted to identify *recognized environmental conditions*, (RECs), *historical recognized environmental conditions* (HRECs), and *controlled recognized environmental conditions* (CRECs) associated with the historical uses of the Property, current site operations, and the condition of surrounding properties. This Phase I ESA can be used by Chester Limited III, LLC to qualify for one of three liability protections (contiguous property owner, innocent landowner, or bona fide prospective purchaser) available under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980 as amended and to obtain an SBA loan.

1.2 <u>Detailed Scope of Services</u>

Information required to complete the Phase I ESA was obtained from personal interviews and review of *practically reviewable* and *reasonably ascertainable* records. Informational sources include the following:

| Section | Source | Adequate | Inadequate/ Data Gap | Source |
|---------|------------------------------|----------|-------------------------|--------------------|
| 6.0 | Interviews | х | | Seller/Occupant |
| 3.0 | User-Provided Information | х | | Questionnaire |
| 4.4.5 | Assessing Documents | х | | City of Port Huron |
| 4.2.3 | Building Permits | Х | | City of Port Huron |
| 2.2 | Zoning | Х | | City of Port Huron |
| 4.2.2 | Fire Department Records | х | | Port Huron F. D. |
| 4.2.1 | Health Department Records | х | | St. Clair County |



| Section | Source | Adequate | Inadequate/ Data Gap | Source |
|---------|-------------------------------|----------|-------------------------|------------------------|
| 4.2.4 | Liens Search | Х | | DEQ |
| 4.4.2 | Aerial Photographs | Х | | EDR |
| 4.4.3 | Sanborn Map Search | Х | | EDR |
| 4.4.4 | City Directories | х | | Library of Michigan |
| 4.1 | Regulatory Database Review | х | | EDR |

1.3 Significant Assumptions

Information obtained during this assessment, to the extent it was relied on to form our opinion, was assumed to be complete and accurate. ASTI cannot be held responsible for the quality or content of information obtained from interviews and standard sources. Since ASTI cannot warrant or guarantee that the information provided by interviews and standard sources is accurate or complete, the intention of this Phase I ESA is to reduce, but not eliminate, uncertainty for the potential for RECs, HRECs, and CRECs on the Property.

1.4 <u>Limitations and Exceptions</u>

The information and opinions included in this report were given in response to a limited scope of work, being a Phase I ESA per ASTM Practice E1527-13 and AAI, and should be considered and implemented only in light of that particular scope of work. This Phase I ESA also meets the requirements of ASTM Practice E1527-05. The services provided by ASTI in completing this assessment have been provided in a manner consistent with the normal standards of the profession. No other warranties, expressed or implied, are made.

Non-scope issues are considered by ASTM E1527-13 as beyond the scope of a Phase I ESA. These issues may affect business environmental risk at the Property. These non-scope issues may warrant assessment based on the type of Property transaction.

No testing or sampling of materials (for example, soil, water, and air) was included in this assessment. No limiting conditions were identified during the site reconnaissance, except for the presence of machinery and material storage within the shop areas of the building limiting ASTI's view of the entire shop floor area.



Responses received from regulatory agencies or other secondary sources of information after the issuance of this report may alter the facts, findings, conclusions, or recommendations to this ESA.

1.5 **Special Terms and Conditions**

The Phase I ESA was performed in conformance with the scope and limitations of ASTM Practice E1527-13 and AAI. No special terms and conditions outside ASTM Practice E1527-13 and AAI have been addressed. Under the AAI Rule and ASTM Practice E1527-13, all appropriate inquiries must be conducted within one year prior to the date of transaction of the Property. However, certain components of the all appropriate inquiries (interviews, liens searches, records review, and visual inspections) must be conducted or updated within 180 days prior to the date of the Property transaction.

1.6 <u>User Reliance</u>

The Phase I ESA was performed for the benefit of Jeffrey Sheehan and Chester Limited III, LLC and ASTI acknowledges that said parties may rely on the contents and conclusions presented in this report. ASTI acknowledges the fact that the scope of work was sufficient in ASTI's opinion to uncover, to the extent of ASTI's services, potential environmental liabilities at the Property.

This effort was performed per authorization of Jeffrey Sheehan on April 24, 2014. The information and opinions rendered in this report are exclusively for use by Jeffrey Sheehan and Chester Limited III, LLC and ASTI will not distribute or publish this report without the consent of Jeffrey Sheehan, except as required by law or court order.

Any use a third party makes of this report, or any reliance upon it, or any decisions based on it, is the sole responsibility of the third party. A third party is not afforded the status of a third party beneficiary unless ASTI expressly agrees to such status in writing. ASTI has no responsibility for any damages that may be suffered by a third party as a result of any decision made, or action taken by a third party, based on this report.

ASTI warrants that the services, findings, and/or recommendations provided to Comerica Incorporated, its affiliates and subsidiaries, and their respective successors and assigns



(individually and collectively "Comerica"), have been prepared, performed and rendered in accordance with procedures, practices, and standards generally accepted and customary in the consultant's profession for use in similar assignments. ASTI shall indemnify, save and hold harmless Comerica from and against any and all losses, costs, expenses, and liabilities, including without limit reasonable attorneys fees, which are attributable to the breach of the above warranty, up to an aggregate amount of \$1,000,000 (One Million Dollars), notwithstanding any limitation (expressed or implied) containing in any other agreement or document relating to the services, findings, and/or recommendations provided by ASTI.



2.0 SITE DESCRIPTION

2.1 <u>Location and Legal Description</u>

| General Location | East side of 20th Street, west of 16th Street, north of Dove | |
|------------------------|--|--|
| | Street, south of Bear Street | |
| Quarter Section & | SE 1/4 Section 16, T6N R17E | |
| Township and Range | | |
| City/Township; County; | Cit of Port Huron, St. Clair County, Michigan 48060 | |
| State; Zip Code | | |
| Parcel Number(s) | 06-182-0047-000 | |

A Site Location Map is provided in Appendix A. A copy of the assessment record with the legal description is included in Appendix D.

2.2 <u>Site and Vicinity General Characteristics</u>

| Acreage | 3.64 |
|-------------------|-----------------------|
| Topography | Relatively Flat |
| Zoning | M-1, Light Industrial |
| Local Development | Industrial |
| Utilization | |

A Site Features Map is included in Appendix A. Photographs of the Property and adjoining properties were taken during the site inspection and are provided as Appendix B.

2.3 Current Use of the Property

The Property is occupied Wirtz manufacturing. This was one of four plants for the company and operations include machining and plastic cutting. Wirtz is a manufacturer of battery equipment comprising of grid and plate manufacturing, oxide conveying and mixing, battery assembly, and corrosive resistant conveyors and finishing line machines. At the time of ASTI's assessment, operations at the site were limited with only one employee.

2.4 <u>Descriptions of Structures, Roads, Other Improvements on the Site</u>

The Property contains one building with the description as follows.



| | Building Description | | | | | |
|---|----------------------|-------------|--------------------|---------|----------|-----------|
| # | Building | Primary Use | Functional Spaces | # | Built | Stories |
| | Type | | | Present | Date | |
| 1 | Light | Machining & | Office, bathrooms, | 1 | Original | 1 with |
| | Industrial | Office | shop, truck well, | | 1967 | small |
| | | | bathrooms, | | with | mezzanine |
| | | | mezzanine, break | | 1991 | |
| | | | room, compressor | | office | |
| | | | room | | addition | |
| | | | | | and | |
| | | | | | 1994 | |
| | | | | | shop | |
| | | | | | addition | |

| Building Construction | | | |
|--|--------|---|---|
| Building Square Primary Construction # Footage | | Interior Finishes | |
| 1 | 23,735 | Concrete slab, block, steel framework, brick veneer insulation metal, flat roof | Drywall, carpet, base cove, resilient floor tiles, acoustic ceiling tiles, fluorescent lighting, aluminum clad windows, paint |

| | Roads and Other Improvements | | | |
|-----------------|--|--|--|--|
| Access | Access Entrance near southwest corner from 20th Street | | | |
| Paved Areas | South of building and southeast of building | | | |
| Maintained Lawn | West of building, southwest corner, north of building, east portion of | | | |
| | Property | | | |
| Landscaped | Along 20th Street | | | |
| Areas | | | | |
| Surface Water | None observed | | | |
| Other | A canopy storage area added in 2008 is present on the southeast corner of the building | | | |

| Municipal Services and Utilities | | | |
|----------------------------------|---------|---------------------|---|
| Service or Utility | Present | Provider | Comments |
| Potable Water Source | x | City of Port Huron | |
| Irrigation Well | | | |
| Sewage | Х | City of Port Huron | |
| Storm Sewer | Х | City of Port Huron | |
| Electrical | Х | SEMCO | |
| Natural Gas | Х | DTE Energy | |
| Solid Waste Disposal | х | Waste Management | No staining observed in area of dumpsters |



| Municipal Services and Utilities | | | |
|----------------------------------|---------|----------|--------------------------------|
| Service or Utility | Present | Provider | Comments |
| | | HVAC | Roof-mounted HVAC (two) for |
| | | | office area |
| | | | One room in northwest shop has |
| Heating & Cooling | х | | AC with units on the northeast |
| g g | | | exterior at ground level |
| | | | Remainder of shop has ceiling- |
| | | | mounted space heaters |

2.5 <u>Current Uses of Adjoining Properties</u>

ASTI observed adjoining properties during the site inspection to evaluate the potential risk these properties may pose to the Property. Observations were made from the Property and public access areas, as appropriate. Each is described as follows.

| | Adjoining Property Use | | | | |
|-------------------------------|--|---|------------------------------|--|--|
| Direction from Property | Occupant & Address | Use | Potential Concerns | | |
| North | Tapex 2626 20th St. | Manufacturer of high strength disposable load securement strap for truck, rail & intermodal shipments of paper products | None observed | | |
| South | DHL 2660 20th St. Large industrial for | Shipping Storage | None observed None observed | | |
| | warehouse rental 1721 Dove | Otorage | None observed | | |
| East | SMR Plant 5 2655 16th St. | Manufacturer of rearview mirrors | None observed | | |
| West | Ontario Die 2735 20th St. | Manufacturer of cutting dies for non metallic materials | None observed | | |
| | Black River Mfg. 2625 20th St. | Automotive parts machining | None observed | | |
| | Undeveloped lot | None | None | | |



3.0 USER PROVIDED INFORMATION

Jeffrey Sheehan representing Chester Limited II, LLC, completed a User Questionnaire dated May 5, 2014. The following responses were provided (Appendix C).

| | | Question | Response |
|---|--|---|----------------------|
| 1 | ident reco triba | a search of recorded land title records tify any environmental liens filed or rded against the Property under federal, I, state, or local law? | No |
| 2 | Did a search of recorded land title records identify and Activity Use Limitations such as engineering controls, land use restrictions, or institutional controls that are in place at the Property and/or have been filed or recorded against the Property under federal, tribal, state, or local law? | | No |
| 3 | expe prop the s form of th | rou have specialized knowledge or eriences related to the property, nearby erties? For example, are you involved in same line of business as the current or er occupant so that you have knowledge e chemicals and process used by this type usiness. | No |
| 4 | Does the purchase price being paid for this Property reasonably reflect the fair market value of the Property? If you conclude there is a difference, have you considered whether a lower price is due to contamination known or believed to be present? | | No Not Applicable |
| 5 | Are you aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of a release or threatened release? | | No |
| | 5a Do you know past uses of the property? | | No |
| | Do you know specific chemicals that are present or once were present at the property? | | No |
| | Do you know of spills or chemical releases that have occurred at the property? | | No |



| Question | | Response |
|----------|--|----------|
| 5d | Do you know of any environmental cleanups that have taken place at the Property? | No |
| 5e | Based on your knowledge and experience related to the property are there any obvious indicators that point to the presence or likely presence of releases at the property? | No |

3.1 Chain-of-Title Documentation

A chain-of-title was not conducted for this ESA by ASTI nor was one provided by the User. Refer to Section 4.4.6 for Deed records obtained in the City of Port Huron Assessing file.

3.2 Reason for Performing the Phase I ESA

The purpose of this Phase I ESA was to identify existing or potential recognized environmental conditions (as defined by ASTM Standard E1527-13) in connection with the Property and to qualify for one of the Landowner Liability Protections (LLPs) offered by the Small Business Liability Relief and Brownfield's Revitalization Act as amended (the "Brownfields Amendments"). This ESA may also be used to qualify for State of Michigan liability defenses and exemption that may be available under Part 201 of the Natural Resources and Environmental Protection Act.



4.0 RECORDS REVIEW

4.1 <u>Standard Environmental Record Sources</u>

ASTI ordered a government records search for the Property from Environmental Data Resources, Inc. (EDR) in Milford, Connecticut. A copy of The EDR Radius Map Report with GeoCheck®, dated May 6, 2014, is included in Appendix D. A description of the databases, search distances, and results are presented in the report.

| Database List | Property Listing | Adjoining Property Listing | Applicable ASTM Listings |
|--|---------------------|----------------------------------|--------------------------------|
| Federal NPL (1 mile) | No | No | 0 |
| Delisted NPL (0.5 mile) | No | No | 0 |
| Federal CERCLIS (0.5 mile) | No | No | 0 |
| Federal CERCLIS NFRAP (0.5 mile) | No | No | 0 |
| Federal RCRA CORRACTS (1 mile) | No | No | 1 |
| Federal TSD Facility (0.5 mile) | No | No | 0 |
| Federal RCRA Generator (Property/Adjoining) | No | Yes | 2 |
| Federal Inst./Eng. Controls (Property only) | No | No | 0 |
| Federal ERNS (Property Only) | No | No | 0 |
| State/Tribal Hazardous Waste Sites (1 mile) | No | Yes | 5 |
| State/Tribal Equivalent CERCLIS (Michigan Part 201) (0.5 mile) | No | Yes | 1 |
| State/Tribal Landfill or Solid Waste Facility (0.5 mile) | No | No | 0 |
| State/Tribal LUST (0.5 mile) | No | Yes | 7 |
| State/Tribal Registered UST (Property/Adjoining Properties) | No | Yes | 1 |
| State/Tribal Inst./Eng. Controls (Property only) | No | No | 0 |
| State/Tribal Voluntary Cleanup Sites (0.5 mile) | No | No | 0 |
| State/Tribal Brownfield Sites (0.5 mile) | No | No | 0 |



| Database List | Property Listing | Adjoining Property Listing | Additional Listings |
|--|---------------------|----------------------------------|------------------------|
| Michigan Baseline Environmental Assessment Sites (1/10 mile) | No | Yes | 4 |
| Additional Non-ASTM Databases (Property or Adjoining Property) | Yes | Yes | 4 |
| Historical Auto Stations (1/10 mile) | No | Yes | 2 |
| Historical Dry Cleaners (1/3 mile) | No | No | 0 |
| Orphans | No | No | 0 |

4.1.1 <u>Discussion of Property Listings</u>

The Property is listed as a RCRA Non-Generator and was a former small quantity generator for waste code D001 (ignitable hazardous waste). According to a response received by the DEQ on May 13, 2014, no file regarding the former RCRA status was found (Appendix D). According to John Wirtz, the waste oil, coolants, and other chemicals are primarily stored at the main plant and brought on site as needed. He stated that mineral spirits are used to wipe down parts. No other documentation pertaining to the RCRA status was found.

4.1.2 Discussion of Sites of Potential Environmental Concern

FOIA requests were sent to applicable agencies with regard to adjoining property listings. Adjoining property listings are discussed below. For the remaining listed sites, ASTI considers select criteria to determine which sites represent an environmental concern to the Property. The criteria include but are not limited to the following.

- Database type
- Topography relative to the Property
- Direction and distance
- Soil profile identified in available sources
- Known or inferred groundwater depth and flow direction
- Status of applicable investigation
- Surface and subsurface conditions including but not limited to buildings, pavement, utility corridors, and surface water features
- Potable water source (well or municipal)



An evaluation of these criteria is completed to determine the level of risk associated with each site. Sites that are found to have the potential to represent an elevated or high risk are requested through FOIA to applicable agencies.

Using the referenced criteria and based upon the information contained within the EDR report, ASTI did identify additional sites beyond adjoining properties that were considered to represent the potential to be an elevated or high risk to the Property. Adjoining sites and these sites are discussed below.

| Site Name | United Technologies Automotive Inc. |
|-------------------------------------|---|
| Databases | RCRA Nongenerator/FINDS |
| Address | 2626 20th Street |
| Distance and Direction | Adjoining North |
| Documentation Requested/Reviewed | EDR report Requested DEQ Files - None found per letter dated May 1, 2014 (Appendix D) |
| Summary of Findings | Occupant was listed as a large quantity generator for D001 (ignitable hazardous waste). An inspection was conducted in 1988 with no violations reported. The listing is considered to represent minimal environmental risk. |

| Site Name | Black River Mfg. Inc. |
|----------------------------------|--|
| Databases | RCRA CESQ |
| Address | 2625 20th St. |
| Distance and Direction | Adjoining Northwest |
| Documentation Requested/Reviewed | EDR report Requested DEQ Files |
| Summary of Findings | This site has been a small to conditionally exempt small quantity generator of batteries and D001. Inspections records from the DEQ were reviewed from 1987 and 2001. Violations were with regard to record keeping, labeling, and identification numbering. The oil handling area was noted to be at the center of the building in 1987. The listing is considered to represent minimal environmental risk. |



| Site Name | Former Advanced Accessory Systems; Huron St. Clair, Sport Rack Automotive | | |
|----------------------------------|--|--|--|
| Databases | BEAs, RCRA Non-Generator/WDS, Historic Auto Station | | |
| Address | 2655 16th St. | | |
| Distance and Direction | Adjoining East | | |
| Documentation Requested/Reviewed | EDR report DEQ Files Requested | | |
| Summary of Findings | There were no RCRA files for the site per DEQ Letter dated May 13, 2014 (Appendix D). | | |
| | ASTI reviewed a 2011 BEA that included a summary of prior environmental assessments. Concerns included the south adjoining 1721 Dove Street site, historical uses of the site by various occupants using hazardous substances/petroleum products including oil-stained and cracked concrete floors. Groundwater was encountered at the site between four and eight feet below ground surface (bgs). During sampling in 2010, no groundwater parameters including volatile organic compounds and metals were detected exceeding the Part 201 Generic Residential Cleanup Criteria (GRCC). Detections of VOCs were reported in the monitor well nearest the Property located in the west portion of the building. Tricholoroethene was detected in the same location in soil above the Part 201 Drinking Water Protection (DWP) criterion. | | |
| | During an investigation in 2009 that included this site and 1721 Dove Street, the metals arsenic, cadmium, chromium, and lead, were reported in groundwater above DW and/or groundwater surface water interface (GSI) criteria. Relatively high DRO concentrations were reported and vinyl chloride was detected in groundwater above DW criterion. The samples were known to be on the southern portion of the 1721 Dove site. | | |
| | It is noted that this site and the south adjoining 1721 Dove were formerly part of the same facility under Huron St. Clair, Inc. Operations included manufacturing of automotive strip moldings and trim & roof racks. Most manufacturing had occurred at 1721 Dove. | | |

| Site Name Masotech Accessories, St. Clair Metal Products Co., Sport | | |
|---|-----------|--|
| Databases RCRA/WDS/FINDS, NY Manifest, AIRS, SHWS, LUS AUL, NDPES, BEA, Historical Auto Station | | |
| Address | 1721 Dove | |



| Distance and Direction | Adjoining South |
|-------------------------------------|--|
| Documentation Requested/Reviewed | EDR report Requested DEQ Files |
| Summary of Findings | A former occupant Huron St. Clair Metals, later known as Masotech Accessories, and later known as Sport Rack, had two plastic profile extrusion lines that utilize an adhesive, four glue applicators, four masker washers, and a buffing/sanding operation, all of which required air permits. Files regarding the air permit were provided (Appendix D) dated between 1977 and 2001. A PVC process installed in the early 1980s utilized solvents. Scrubbers were not functioning during an inspection in 1981 that may have resulted in the release of nitric acid from a stack. Noted in 1981 were three acid storage tanks, sodium hydroxide tanks, and an oil storage tank. |
| | According to the LARA UST records (Appendix D), five USTs were removed in 1988 with a confirmed release of toluene reported. Soil samples collected reported up to 84,000 ug/Kg of toluene. Additional UST were noted in other records (below) and were stated to be on the southeast portion of the site. |
| | ASTI reviewed a 2012 BEA completed for the site (select copies in Appendix D). Vinyl chloride, chromium, and lead were detected in groundwater above the Part 201 GRCC. Nearest the Property at the time of sampling were chromium and lead. Areas of filling activities were noted during past activities found during past construction activities. Prior sampling also reported the presence of solvents including PCE, TCE, vinyl chloride, and toluene present in groundwater above the GRCC. In 2004, a restriction was placed on the site limiting groundwater usage as part of a restrictive closure regarding the former toluene release. Groundwater was reported between five and six feet bgs with expected flow to the southeast. In 2011, the northwest shop area had hydraulic oil, coolants, greases, unknown materials in totes, 55-gallon drums, and smaller containers with staining and cracking noted on the floor. |
| | Based on the information reviewed, the presence of a solvent plume in groundwater as a result of the former activities at 1721 Dove represents a REC. |



4.2 Additional Agency/Regulatory Sources

4.2.1 Local Health Department

ASTI requested information for the Property from the St. Clair County Health Department. A response dated April 30, 2014 indicated that no records were on file for the Property (Appendix D).

4.2.2 <u>Local Fire Department</u>

A Freedom of Information Act (FOIA) request for Port Huron Fire Department records for the Property was submitted. A response was received indicating that no records were found for ASTs/USTs, spill, releases, dumping, or other known environmental issues (Appendix D). Records provided indicated the presence of compressed gases in the shop area.

4.2.3 <u>Building Permit/Inspections</u>

Building Department permits from Port Huron were provided through FOIA (Appendix D). Permits dated back to 1994 and included interior office and cafeteria renovations, rear shop addition (66'x100') with new parking, and the canopy (lean-to) addition (24'x63').

4.2.4 DEQ RRD Environmental Liens

The DEQ maintains a listing of environmental liens on properties in the State. No environmental liens were listed for the Property (Appendix D).

4.2.5 Oil and Gas Wells

According to Michigan Department of Technology, Management, and Budget Mineral Lease Information, no oil or gas wells are located on or adjoining to the Property.

4.3 Physical Setting Sources

A Physical Setting Sources Map, which includes an overlay of the United States Geological Survey (USGS) topographic map (7.5-minute series) for the Port Huron, Michigan quadrangle, which includes the Property, is provided in the EDR report in Appendix D. The USGS map is also the basis of the Site Location Map in Appendix A.

| Average Elevation (feet above mean sea level) | 610 |
|---|-----------|
| Local Gradient | East |
| Regional Gradient | Southeast |



| Nearest Surface Water Body St. Clair River: 0.35 mile southeast | |
|---|---|
| Groundwater Depth | Based on a review of subsurface investigations in the area, groundwater is between four and eight feet bgs. |
| Groundwater Flow Direction | Potentially to southeast |

Soil composition information for the Property is included in the EDR report (Appendix D) on pages A-4 through A-7. The soil component for the Property is described as follows.

| Soil Component | Soil Texture | Infiltration Rate | Drainage | Hydric |
|-------------------|--------------|-------------------|-----------------|-----------|
| Wainola | Fine sand | Moderate | Somewhat poorly | Partially |

Based on area subsurface investigation, upper soils report include sand and gravel underlain by sand containing some silt. The bedrock formation consists of Mississippian-Devonian, Bedford, and Antrim Shale estimated between 100 and 272 feet bgs. Glacial till is present above the bedrock up to 200 feet.

4.4 <u>Historical Use Information</u>

Reasonably ascertainable standard historical sources as found in Section 8.3.4 of ASTM Practice E1527-13 were used to determine the previous use of the Property and surrounding area. A chronological summary of the sources used may include, but is not limited to aerial photographs, Sanborn maps, city directories, agency records, and prior environmental assessments. ASTI made a *good faith* effort to identify the obvious uses of the Property from the present back to the Property's first developed use, or back to 1940, whichever is earlier. Data failures were encountered as part this assessment and are discussed as data gaps in Section 8.0.

4.4.1 <u>Historical Use Summary of the Property</u>

| Year(s) | Improvements/Use | Source Reference | ce(s) |
|--|---|---|--------|
| At least 1937 through mid-1960s | The Property was undeveloped and likely mined for sand. The Property was owned by Port Huron between 1942 and 1967. | Aerials | Арр. Е |
| 1967-1973 | The original subject building was constructed and was used as a stamping facility that extruded rolled steel and cooled it in quenching oil. The facility operated until around 1973. | Aerials Assessing Records Interviews | Арр. Е |



| Year(s) | Improvements/Use | Source Reference | ce(s) |
|-----------|--|-------------------------------------|--------|
| 1973-1980 | The Property was owned (Dr. Charles Steven) by an investor and leased to Northern Telecom for an unknown period. | City Directories Interviews | |
| 1980 | The Property was sold to Mr. Wirtz for the existing battery equipment manufacturing operation. | City Directories Seller/Occupant | |
| 1991 | An office addition was completed. | Aerials Municipal records | App. E |
| 1994 | An east shop addition with an interior truck well were completed. | Aerials Municipal records | App. E |
| 2007 | The canopy addition was completed. | Aerials Municipal records | App. E |

The Property was undeveloped from at least 1937 through approximately 1967. Sand mining occurred in the area at the time the Property was owned by Port Huron between the 1940s and 1960s. The subject building was built between 1967 and 1970 and used by a stamping operation from approximately 1967 through 1973. During a period between 1973 and 1980, the Property was used by Northern Telecom. The Property was sold to Wirtz Manufacturing in 1980.

4.4.2 <u>Aerial Photographs</u>

ASTI reviewed available aerial photographs of the Property provided by EDR and are summarized below. Copies of the aerial photos are provided as Appendix E.

| Date of Aerial | Observations | Environmental Conditions Identified |
|-------------------|--|---|
| 1937 1941 | The Property appears undeveloped with unimproved trails present. | None |
| 1949 | A large disturbance is present on the east portion of the Property extending north and south of the Property. This may be indicative of a sand mining operation. | Sand mining |
| 1956 | The disturbance remains present in the Property area. | Sand mining |
| 1964 | The Property is undeveloped, but appears to be disturbed from sand mining activities. A few industrial complexes are evident to the south along Dove. | Sand mining |



| Date of Aerial | Observations | Environmental Conditions Identified |
|-------------------|---|---|
| 1970 | The original subject building is present on the northwest portion of the Property. Industrial developments are also present to the north, east, and south. Based on the surrounding area, it does not appear that the former sand mining areas were significantly filled. | None |
| 1980 | Additions to the south, east, and north properties are | None |
| 1985 | present. Additional developments are present to the west. | |
| 1992 | West office addition is present on the subject building. | None |
| 1999 | East shop addition is present on the subject building with | None |
| 2005 | new parking areas on the south side and to the | |
| 2006 | southeast. | |
| 2009 | The canopy addition is present on the southeast side of | None |
| 2010 | the building. Property and adjoining properties appear in | |
| 2012 | current configurations. | |

Although sand mining activities appear to have occurred in the 1940s-1960s, there was no indication in subsequent aerials that large scale filling occurred during the development of the industrial park.

4.4.3 Sanborn Maps

EDR conducted a search of Sanborn maps and none for the Property area were located. A copy of the Sanborn No Coverage Report is provided in Appendix E.

4.4.4 <u>City Directories</u>

A city directory search was conducted at the Library of Michigan. Directories were reviewed for the years between 1940 and 2013. The following tables summarize the results of the Property city directory search.

Property Listings

| | | Year(s) and Listing(s) | | | | |
|------|-------|------------------------|------------|------------|------------|------------|
| Ad | dress | 1940 | 1946-47 | 1950-51 | 1953-54 | 1965 |
| 2654 | 20th | No Listing | No Listing | No Listing | No Listing | No Listing |



| Adduses | | | Year(s) and Listing(s) | | | | |
|---------|--------|--------------|------------------------|------------|------------|------------|--|
| Ac | Idress | 1970 | 1975 | 1980 | 1985 | 1991 | |
| 2654 | 20th | Under | No Listing | No Listing | Wirtz Mfg. | Wirtz Mfg. | |
| | | Construction | | | Plant 2 | Plant 2 | |

| | | Year(s) and Listing(s) | | | | |
|------|--------|------------------------|------------|------------|------------|------------|
| Ac | ldress | 1996 | 2000 | 2005 | 2010 | 2013 |
| 2654 | 20th | Wirtz Mfg. | Not | Not Listed | Wirtz Mfg. | Wirtz Mfg. |
| | | Plant 2 | Researched | | Plant 2 | Plant 2 |

Adjoining Property Listings

| | | | Year(s) and Listing(s) | | | | | |
|------|--------|------------|------------------------|------------|------------|------------|--|--|
| A | ddress | 1940 | 1946-47 | 1950-51 | 1953-54 | 1965 | | |
| 2660 | 20th | No Listing | No Listing | No Listing | No Listing | No Listing | | |
| 2735 | 20th | No Listing | No Listing | No Listing | No Listing | No Listing | | |
| 2625 | 20th | No Listing | No Listing | No Listing | No Listing | No Listing | | |
| 2626 | 20th | No Listing | No Listing | No Listing | No Listing | No Listing | | |
| 1721 | Dove | Residence | Residence | No Listing | No Listing | No Listing | | |
| 2655 | 16th | No Listing | No Listing | No Listing | No Listing | No Listing | | |

| Adduss | | Year(s) and Listing(s) | | | | | | |
|--------|-------|--|--|--|--|---------------------------------------|--|--|
| Add | dress | 1970 | 1975 | 1980 | 1985 | 1991 | | |
| 2660 | 20th | No Listing | No Listing | No Listing | No Listing | No Listing | | |
| 2735 | 20th | No Listing | No Listing | Ontario Die Co. | Ontario Die Co. | Ontario Die | | |
| 2625 | 20th | No Listing | No Listing | No Listing | Black River Mfg. (auto parts) | Black River Mfg. (auto parts) | | |
| 2626 | 20th | Assembly Specialties Inc. | P C I Corp. (auto trim) | Inmont Corp. (plant 1) auto parts mfg. | United Technologies (auto comp. whs.) | United Technologies (auto comp. whs.) | | |
| 1721 | Dove | Huron Mfg, Co. (auto trim plant) | St. Clair Metal Products (auto trim plant) | St. Clair Metal Products (auto trim plant) | St. Clair Metal Products | Huron St. Clair Inc. (plant 2) | | |



| Address | | Year(s) and Listing(s) | | | | | | |
|---------|-------|--------------------------|--|---|---|---|--|--|
| Add | aress | 1996 | 2000 | 2005 | 2010 | 2013 | | |
| 2655 | 16th | No Listing | Huron St. Clair Co. (Div of Masco) | Huron St. Clair Co. (Div of Masco) Auto acs. mfg. | Huron St. Clair Co. (Div of Masco) Auto acs. mfg. | Huron St. Clair Co. (Div of Masco) Auto acs. mfg. | | |
| 2715 | 16th | Huron Mfg. Plant | No Listing | No Listing | No Listing | No Listing | | |
| 2660 | 20th | No Listing | Not Researched | Air Express Internat. | Air Express Int. | DHL | | |
| 2735 | 20th | Ontario Die Co. | Ontario Die Co. | Ontario Die Co. | Ontario Die Co. | Ontario Die Co. | | |
| 2625 | 20th | Black River Mfg. | Black River Mfg. | Black River Mfg. | Black River Mfg. | Black River Mfg. | | |
| 2626 | 20th | Vacant | Not Researched | Formex Internatio nal (metal stamping) | Formex Int. Tapex American Corp. (metal goods mfg.) | Tapex American Corp. (metal goods mfg.) | | |
| 1721 | Dove | Masco Tech Access. | Sport Rack Hardware | Not Research ed | No Listing | No Listing | | |
| 2655 | 16th | Not Searched | Not Searched | Not Searched | No Listing | No Listing | | |

4.4.5 Property Assessor/Tax Files

Assessing Department files were available for review. A current assessing record is provided in Appendix D. The records indicate the original building was constructed in 1972 with additions in 1991 and 1991 and a remodel in 1995. All utilities were connected during construction including gas heat. The 1994 addition included new parking and a canopy was added in 2008. Deed information is discussed below in Section 4.4.6.

4.4.6 Title Search

Deed information in the Assessing records included the following:

• Port Huron acquired in 1942



- Port Huron to Mericka, DeCourval, & Huthwaite in 1967
- Mericka, DeCourval, & Huthwaite to Stevens in 1973
- Stevens to Wirtz (John) in 1980
- Transfers to entities represented by Wirtz in 1988, 1989, and 1994 including Ogden Realty Co., 20053 Olympia, and Wes Mgt. Company

4.4.7 <u>Previous Environmental Reports</u>

ASTI was not provided with nor is aware of any prior environmental investigations on the Property.

4.5 <u>Historical Use Summary of the Adjoining Properties</u>

The historic uses of adjoining properties are summarized as follows.

| | Summary of Historic Uses of Adjoining Properties | | | | |
|-----------|---|--|--|--|--|
| Direction | Historical Use Summary | Source(s) | | | |
| North | The north adjoining property was undeveloped until the late 1960s when the existing building was constructed. An addition was completed in the 1980s. Former occupants include Assembly Specialties Inc., Inmont Corp., PCI Corp., United Technologies, and Formex International. Operations have included auto parts manufacturing and warehousing and metal stamping. | Aerials City Directories | | | |
| South | The south adjoining 1721 Dove was built in the late 1960s and occupied by Huron Mfg., St. Clair Metal Products, Huron St. Clair; a division of Masco, and Sport Rack. Operations have included automotive part manufacturing. The south adjoining 2660 20th St. was built in the early 2000s and the prior occupant was Air Express International. Use has consisted of shipping services. | Aerials City Directories BEAs | | | |
| East | The east adjoining 2655 16th Street was built in the late 960s with additions in the 1970s. Prior occupants have included Huron St. Clair (offices and some manufacturing; associated with 1721 Dove) and Advanced Accessory Systems. | Aerials City Directories BEAs | | | |
| West | The west adjoining sites were constructed in the 1970s. Occupancy has been the existing tenants since construction. Use has included manufacturing of cutting dies for non metallic materials and automotive parts machining. | Aerials City Directories | | | |



5.0 SITE RECONNAISSANCE

5.1 <u>Methodology and Limiting Conditions</u>

| Assessor Name and Title | Carey Kratz, Environmental Professional |
|-------------------------|--|
| Date of Inspection | May 6, 2014 |
| Weather Conditions | Clear sky and seasonal temperature |
| Methodology | Systematic: Inspected all interior spaces, exterior of Property including all property boundaries, and adjoining properties from Property and public access areas. |
| Access Limitations | Machinery and other materials limiting views of the shop floor. |

5.2 **General Site Settings**

| | East side of 20th Street, west of 16th Street, north of Dove |
|------------------------|--|
| General Location | Street, south of Bear Street |
| Quarter Section & | SE ¼ Section 16, T6N R17E |
| Township and Range | |
| City/Township; County; | Cit of Port Huron, St. Clair County, Michigan 48060 |
| State; Zip Code | |
| Local Development | Industrial |
| Utilization | |

5.3 <u>Exterior Observations</u>

The following table summarizes the site exterior observations. Items observed are discussed further following the table.

| Category | Item | Item Observed |
|------------------------------------|---|------------------|
| Above Ground | Drums, barrels or containers >=5 gallons in connection with identified uses | No |
| Hazardous Substances and Petroleum | Drums, barrels or containers >=5 gallons not in connection with identified uses | No |
| Products | Unidentified Substance Containers | No |
| | ASTs | No |
| Underground | USTs (fill ports and/or vent pipes) | No |
| Hazardous Substances | Fuel dispensers | No |
| and Petroleum Products | Natural gas or petroleum pipelines/wells | No |



| Category | Item | Item Observed |
|---|--|------------------|
| Dasia 9 Chasializad | Pole-mounted transformers | Yes |
| Basic & Specialized | Pad-mounted transformers | Yes |
| Systems (Electrical, | | |
| Hydraulic, | Capacitors | No |
| Refrigeration, & PCBs) | Hydraulic equipment | No |
| | Emergency generator | No |
| | High-power transmission lines (EMF) | No |
| | Stained soil or pavement | Yes |
| Indications of Doloros | Stressed vegetation | No |
| Indications of Releases or Potential Releases | Pools of liquid | No |
| | Strong or pungent odors | No |
| | Filled Land | No |
| | Unregulated/Unauthorized Waste Disposal | No |
| | Pits | No |
| | Ponds | No |
| | Lagoons | No |
| Drainaga & Wasta | Sumps | No |
| Drainage & Waste Collection Systems | Storm water collection basins | Yes |
| | Monitor wells | No |
| | Dry wells/crocks | No |
| | Oil-water separators | No |
| | Regulated/Authorized Waste Removal (Dumpsters) | Yes |

Basic and Specialized Systems - Transformers

Three DTE Energy-owned pole-mounted transformers of similar make are located on a utility pole on the north boundary near the center region of the Property. The transformers were of good condition and one had a non-PCB sticker.

Two DTE Energy-owned pad-mounted transformers are located on the north side of the building, west of the compressor room. The transformers were in good condition and on a concrete pad. They represent minimal environmental risk.

Even though not all DTE Energy-owned transformers have been tested, according to DTE Energy Personnel, their transformers are not "PCB transformers" as defined by the United States Environmental Protection Agency (US EPA). In the unlikely event of a spill or leak from any DTE Energy-owned equipment, the Property will be properly cleaned and, as nearly as possible, returned to its condition before the spill by DTE Energy.



Indications of Releases/Potential Releases- Staining

The east exterior wall of the compressor room exhibited dark staining as a result of oil leakage from the compressor. The staining observed was indicative of a REC. Some rust staining was observed in the roll-off and scrap metal dumpster area on the concrete pavement, which represents minimal environmental risk.

<u>Drainage & Waste Collection Systems - Storm drains</u>

Storm water drains were observed in the paved areas that are connected to the municipal storm water system.

<u>Drainage & Waste Collection Systems - Dumpsters</u>

A standard Waste Management dumpster is present west of the canopy. A large roll-off dumpster and a scrap metal dumpster are present southeast of the building. Only rust staining was observed in the dumpster areas.

Two exhaust pipes were observed on the east exterior of the building. According to Mr. Wirtz, these pipes are for the air exhaust for a vacuum system used in routing plastic sheets. A water reservoir is located in a cooling water system located at the northeast corner of the building.

5.4 <u>Interior Observations</u>

The following table summarizes the site interior observations. Items observed are discussed further following the table.

| Category | Item | Item Observed |
|---|---|------------------|
| Above Ground | Drums, barrels or containers >=5 gallons in connection with identified uses | Yes |
| Hazardous Substances and Petroleum | Drums, barrels or containers >=5 gallons not in connection with identified uses | No |
| Products | Unidentified Substance Containers | No |
| | ASTs | No |
| Underground Hazardous Substances and Petroleum Products | USTs (fill ports and/or vent pipes) | No |



| Category | Item | Item |
|--|--|-----------|
| | Tuesday | Observed |
| | Transformers | Yes |
| | Capacitors | No |
| Dania & Chanializad | Elevators | No |
| Basic & Specialized Systems (Electrical, | Compressors | Yes |
| Hydraulic, | Compactors | No |
| Refrigeration, & PCBs) | Hydraulic Hoists | No |
| Refrigeration, & FCBs) | Hydraulic Equipment other than those above | Yes |
| | Emergency generators | No |
| | Refrigeration/chillers | No |
| | PCB ballasts | Potential |
| Indications of Releases | Staining | Yes |
| or Potential Releases | Pools of liquid | Yes |
| | Strong or pungent odors | No |
| | Pits | Patching |
| | Standard floor drains | Yes |
| | Sumps/manhole covers | Yes |
| Drainage & Waste | Trench drains | No |
| Collection Systems | Monitor wells | No |
| | Dry wells/crocks | No |
| | Oil-water separators | No |
| | Wastewater discharge systems | No |

<u>Hazardous Substances and Petroleum Products - 55-Gallon Drums and 5-Gallon Buckets</u>

One 5-gallon bucket of compressor oil was present in the compressor room. One 55-gallon drum of Chevron RS ISO 220 oil, four 5-gallon buckets of gear lubricant, and two liters of rust inhibitor were present in the shop addition. Three 55-gallon drums that are part of a plastic piece collection system were present in the shop addition. Three 55-gallon drums of waste oil, regal oil, machine oil, and mineral spirits were present outside the truck bay wall in the southeast shop. One 5-gallon bucket of spindle oil was present in the northwest machining area. No staining was observed in the container storage areas and no drum scars were observed on the shop floors. According to Mr. Wirtz, the main plant maintains the majority of materials that were or are used. In addition, six compressed gas cylinders for welding were present in the shop addition.

Basic and Specialized Systems - Transformers

Dry-type transformers were observed at various electrical areas in the shop areas.



Basic and Specialized Systems - Transformers

Fluorescent light ballasts are considered to contain PCBs unless labeled as "No PCBs". All unlabeled ballasts should be removed, replaced with No PCBs-labeled ballasts, and properly disposed during routine maintenance or renovation activities. All ballasts should be inspected and properly disposed prior to any planned demolition.

Basic and Specialized Systems - Compressors

The compressor room contained one compressor, two air tanks, and one dryer. Significant staining was observed on the east wall of the room, nearest the compressor unit.

Basic and Specialized Systems - Hydraulic Equipment

Hydraulic machinery is present in the shop areas, primarily in the original shop area. The majority of the machinery had catch trays and small hydraulic reservoirs. Those areas of concern are discussed below. Several small cranes are present in the building that are mounted to the foundation. These cranes contain small amounts of hydraulic fluid.

Indications of Releases/Potential Releases- Staining and Pools of Liquid

Other than the compressor staining referenced above, two stained areas were noted in the north original shop areas. One stain was on solid concrete and of a quantity not of concern located near the northeast corner of the north shop wall at the AC shop room. Further east of this corner was an area where there had been several cut-outs/small pits and patching within the concrete. According to Mr. Wirtz, the areas of patching related to their machining re-enforcements should not extend more than 24" bgs. One area of staining was observed in this area that is of significance. The staining was the result of the operations of hydraulic machine units in these areas. The remainder of the concrete in the building was in good condition and with only minimal staining present near machinery.

<u>Drainage & Waste Collection Systems - Sumps, Drains, and Pits</u>

A storm water drain was observed in the truck well that contained dirt at the time of ASTI's inspection. The drain had a cover to minimize solids from entering the sump. Standard sanitary sewer floor drains are present in the shop bathroom.

See above paragraph with regard to staining for information regarding small pits present in the shop areas.



There was no indication or documentation pertaining to the current or former use of potable wells or septic systems on the Property.



6.0 INTERVIEWS

6.1 <u>Interview with Owner</u>

John Wirtz completed a Seller's Questionnaire and answered follow-up questions via email. The Seller's Questionnaire is provided in Appendix G. Mr. Wirtz has been associated with the Property for 25+ years. He stated that it has been used for light assembly and welding. He was not aware of any drains, sumps, or oil-water separators, USTs, or ASTs. He is not aware of the prior use of the Property. He stated the machine foundations were installed up to 24 inches below grade and that they patched over the machine hold down areas. Wirtz stores oils, coolants, and other chemicals at the main plant and takes whatever is needed to this plant. Mineral spirits are used to wipe down machinery. The two pipes on the exterior wall are for air exhaust part of vacuum system and the unit at the northeast corner of the building is for cooling water.

6.2 <u>Interview with Site Manager</u>

Refer to Sections 6.1 and 6.3.

6.3 <u>Interview with Occupants</u>

Refer to Section 6.1. One operator was present during ASTI's inspection who had only been employed by Wirtz for one year. He stated that the oven unit in the building has not been used and stored in this plant. No other significant information was provided.

6.4 <u>Interviews with Local Government Officials</u>

Conversations with local government officials were limited to requesting assessment and building department records.

6.5 Interviews with Others

Don Cole, broker, provided information from the original owner and builder of the Property. According to the information provided, the building was constructed in 1967 and operated as a stamping facility for one product. The operations extruded rolled steel and would cool it in quenching oil only; no other chemicals were present. In 1973, the building was sold to an investor who leased the facility for an unknown period to Northern Telecom. The Property was sold to Wirtz Manufacturing in 1980.



7.0 DISCUSSION REGARDING POTENTIAL VAPOR MIGRATION/ENCROACHMENT

The purpose of Tier 1 Non-Invasive screening is to conduct an initial screen to determine if a vapor migration/encroachment condition (VEC) exists at the Property. The vapor migration/encroachment screen (VES) was conducted in accordance with ASTM E 2600-10.

Screening tests: 1) search distance test to determine if there are any known or suspected contaminated properties in the area of concern (AOC) 2) a chemicals of concern (COC) test to determine for those known or suspect contaminated properties within the AOC whether or not COC are likely to be present. The critical distance is defined as the lineal distance in any direction between the nearest edge of the contaminated plume and the nearest property boundary. For contaminated properties downgradient of the Property the AOC is reduced to the area within the critical distance.

- Critical distance = 30 feet for dissolved petroleum hydrocarbon COC)
- Critical distance = 100 feet (COC and petroleum hydrocarbon COC @ LNAPL)

The primary AOC is $\frac{1}{3}$ mile (1,742 feet) for COC and $\frac{1}{10}$ mile (528 feet) for petroleum hydrocarbon COC. The following sites were considered for screening based on their proximities closest to the Property within the primary areas of concern.

| Name | Address | Distance/Direction | Listing Reference |
|------------------------|-----------|--------------------|-------------------|
| Former St. Clair/Huron | 1721 Dove | Adjoining S and E | EDR Report |
| St. Clair/Masotech | 2655 16th | | DEQ Files |

ASTI reviewed a 2012 BEA completed for the site (select copies in Appendix D). Vinyl chloride, chromium, and lead were detected in groundwater above the Part 201 GRCC. Nearest the Property at the time of sampling were chromium and lead. Areas of filling activities were noted during past activities found during past construction activities. Prior sampling also reported the presence of solvents including PCE, TCE, vinyl chloride, and toluene present in groundwater above the GRCC. Groundwater was reported between five and six feet bgs with expected flow to the southeast. In 2011, the northwest shop area had hydraulic oil, coolants, greases, unknown materials in totes, 55-gallon drums, and smaller containers with staining and cracking noted on the floor. Based on the information



reviewed, the identified groundwater impacts were associated with PCE, TCE, and vinyl chloride.

At this time, it is not known if past Property use has resulted in a potential vapor intrusion condition (pVIC) with regard to the subject building. Sub-slab soil gas sampling may be warranted if pVICs are identified in soil and/or groundwater.



8.0 DATA FAILURE AND DATA GAPS

Data gaps occur when the EP is unable to obtain information required despite a *good faith* effort. Data failure is one type of data gap. According to ASTM Practice E1527-13, data failure occurs when all of the standard historical sources that are *reasonably ascertainable* and likely to be useful have been reviewed and yet the objectives have not been met. Historical sources are required to document property use back to the Property's first developed use or back to 1940, whichever is earlier. Data gaps were encountered during the investigation consisting of the following.

| Data Gap Inability to interview prior owners. | | | |
|--|--|--|---|
| Does this data gap constitute Yes No one of the following: | | | |
| REC | | | x |
| Rationale | Information from other sources provided sufficient information regarding past use. | | |



9.0 FINDINGS

Below is a summary of the findings of this Phase I ESA.

De Minimis Conditions

ASTI did not identify de minimis conditions associated with the Property.

Historic Recognized Environmental Conditions (HRECs)

ASTI did not identify any HRECs associated with the Property.

Controlled Recognized Environmental Conditions (CRECs)

ASTI did not identify any CRECs associated with the Property.

Recognized Environmental Conditions (RECs)

This assessment has revealed no evidence of recognized environmental conditions (RECs) in connection with the Property. This assessment has revealed no evidence of recognized environmental conditions (RECs) in connection with the Property, except for the following.

- The subject building was constructed in 1967 and used as a stamping facility through 1973 that would cool rolled steel in quenching oil. The storage, handling, and disposal practices related to the quenching oil is not known and machine pits may have been present (see REC #2).
- The north portion of the original shop including the AC room and area east to the addition contained several foundation scars the result of machining operations. Significant staining was present in one area entering a cracked area in the foundation.
- 3. The compressor room was heavily stained and staining was noted on the east exterior wall of the room.
- 4. A groundwater plume containing metals and solvents was identified to the south of the Property. Solvent soil impacts were also identified to the east of the Property. These impacts are the result of former automotive parts manufacturing operations on the south adjoining 1721 Dove and east adjoining 2655 16th Street sites. The extent of the groundwater plume is not known and the identified off-site impacts also represent a pVEC.



10.0 OPINION

In the professional opinion of ASTI, an appropriate level of inquiry has been made into the previous ownership and uses of the Property consistent with good commercial and customary practice in an effort to minimize liability. Below is a summary providing the basis for our opinion with regard to the items referenced in Section 9.0.

The subject building was used as stamping facility from approximately 1967 through 1973. Operations included cooling rolled steel in quenching oil. Storage, handling, and disposal practiced related to the quenching oil is not known. In addition, scarring was observed in areas of the building that may have been associated with former machine pits related to this operation. The potential for releases associated with the former stamping operation results in a REC.

The north portion of the original shop including the AC room and area east to the addition contained several foundation scars the result of machining operations. Significant staining was present in one area entering a cracked area in the foundation. Due to the unknown integrity of the concrete foundation, subsurface machine pits, and staining from operating machinery, the foundation breaches and staining represent a REC.

Compressor oil leakage resulted in heavy staining along the east wall of the compressor room. The staining was apparent on the exterior ground surface of the east wall resulting in a REC.

A groundwater plume containing metals and solvents was identified to the south of the Property. Solvent soil impacts were also identified to the east of the Property. These impacts are the result of former automotive parts manufacturing operations on the south adjoining 1721 Dove and east adjoining 2655 16th Street sites. The extent of the groundwater plume is not known and the identified off-site impacts also represent a pVEC. The plume and/or soil gas vapors associated with the plume and soil impacts may exist on the Property resulting in a REC.



11.0 CONCLUSIONS

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-13 of 2654 20th Street in Port Huron, St. Clair County, Michigan, referred to as the "Property". Any exceptions to, or deletions from, this practice are described in Section 1.4 of this report. This assessment has revealed no evidence of recognized environmental conditions (RECs) in connection with the Property, except for the following.

- 1. The subject building was constructed in 1967 and used as a stamping facility through 1973 that would cool rolled steel in quenching oil. The storage, handling, and disposal practices related to the quenching oil is not known and machine pits may have been present (see REC #2).
- 2. The north portion of the original shop including the AC room and area east to the addition contained several foundation scars the result of machining operations. Significant staining was present in one area entering a cracked area in the foundation. The foundation breaches and staining represent a REC.
- 3. The compressor room was heavily stained and staining was noted on the east exterior wall of the room.
- 4. A groundwater plume containing metals and solvents was identified to the south of the Property. Solvent soil impacts were also identified to the east of the Property. These impacts are the result of former automotive parts manufacturing operations on the south adjoining 1721 Dove and east adjoining 2655 16th Street sites. The extent of the groundwater plume is not known and the identified off-site impacts also represent a pVEC.



12.0 DEVIATIONS

No deletions, deviations, or additions to E1527-13 or AAI have occurred during this assessment, except with regard to select Comerica Bank non-scope items discussed in Section 13.0..



13.0 ADDITIONAL SERVICES

Because Comerica Bank is the proposed lender associated with the SBA loan for this transaction, a limited asbestos-containing material inspection has been proposed to meet Comerica Bank's requirements and if authorized, will be provided under separate cover. Suspect materials observed were limited to office finish materials including drywall, flooring, and ceiling tile. ASTI will consult with the User regarding proposed prior renovations prior to completion of the assessment.

The Property is for industrial use and remain such use; therefore, a lead-based paint inspection was not conducted.

No indications of microbial growth or moisture intrusion were observed. The roof appeared to be in good condition. A few old stains were noted on ceiling tiles likely associated with past leaks associated with the water piping.

No non-compliance issues (ENCIs) were identified during the assessment.

No presence or potential presence of wetlands was observed on or adjacent to the Property.

No AULS were identified with regard to the Property.



14.0 REFERENCES

The following references were used in preparing this Phase I ESA.

- Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process E1527-13
- 40 CFR Part 312: Standards and Practice for All Appropriate Inquiries; Final Rule (AAI), November 1, 2005
- ASTM E 2600-10 Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions
- Comerica Bank Guidelines
- The EDR Radius Map Report with GeoCheck, May 6, 2014
- The EDR Aerial Photo Decade Package, May 2, 2014
- EDR Certified Sanborn Map Report, April 28, 2014
- User Questionnaire, Jeffrey Sheehan, May 5, 2014
- Port Huron Assessing and Building Department
- St. Clair County Health Department, Environmental Health Division
- Port Huron Fire Department
- DEQ Perfected Environmental Liens List, January 24, 2014
- City Directories, Library of Michigan
- Michigan Department of Technology, Management, and Budget Mineral Lease Information, http://www.michigan.gov/cgi/0,4548,7-158-52927_53037_12540_13818-30992--,00.html
- John Wirtz, Owner and Occupant
- Don Cole, Kramer Commercial Realty
- Department of Environmental Quality
- Department of Licensing and Regulatory Affairs



15.0 SIGNATURE(S) OF ENVIRONMENTAL PROFESSIONAL(S)

I declare that, to the best of our professional knowledge and belief, I meet the definition of Environmental Professional as defined in 312.10 of 40 CFR 312.

I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Carey Kratz, EP

Manager - Phase I ESAs

Glossary

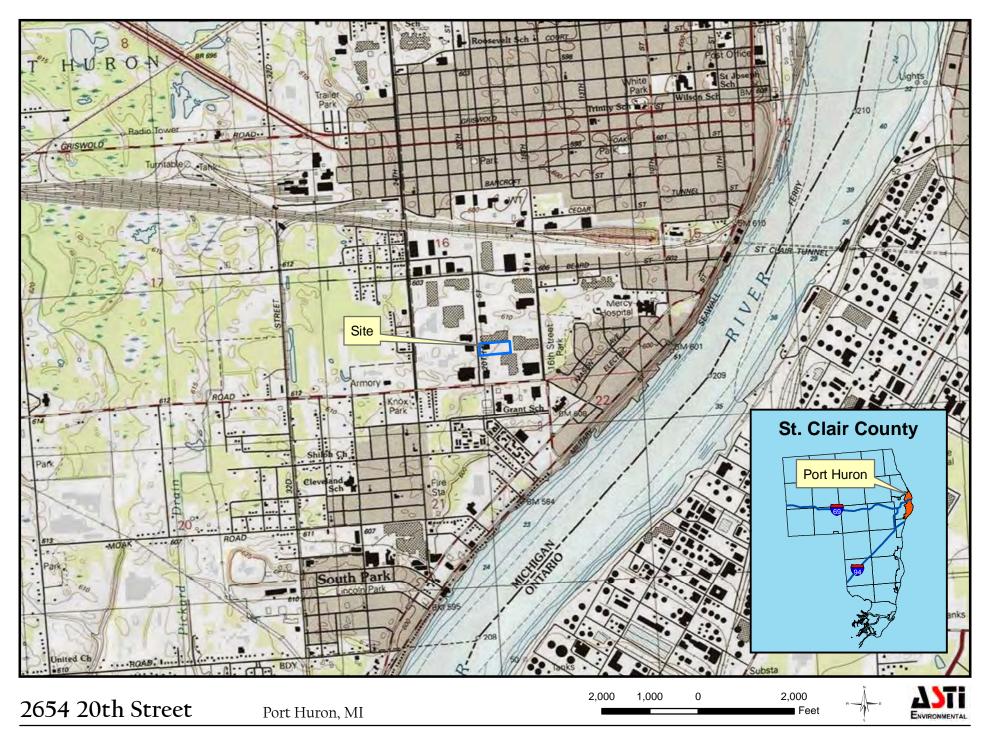
- Hazardous Substance: A substance defined as A) any substance designated pursuant to section 1321(b)(2)(A) of Title 33, B) any element, compound, mixture, solution, or substance designated to section 9602 of this title, C) any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of the RCRA Act of 1976, as amended, D) any toxic pollutant listed under section 1317(a) to Title 33, E) any hazardous air pollutant listed under section 112 of the Clean Air Act, and F) any imminently hazardous chemical substance or mixture with respect to which the Administrator of the EPA has taken action pursuant to section 2606 of Title 15.
- Petroleum Product: Petroleum including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under Subparagraphs (A) through (F) of 42 U.S.C. 9601 (14), natural gas liquids, liquefied natural gas, and synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
- De minimis: Conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.
- *Material Threat:* A physically observable or obvious threat which is reasonably likely to lead to a release that, in the opinion of the EP, is threatening and might result in impact to the public health or the environment.
- *Migration*: The movement of hazardous substances or petroleum products in any form including, for example, solid and liquid at the surface or subsurface, and vapor in the subsurface.
- Release: Spilling, leaking, pumping, pouring, emitting, discharging, injecting, escaping, leaching, dumping, or disposing into the environment.
- Reasonably Ascertainable: Information that is (1) publicly available, (2) obtainable from its source within reasonable time and cost constraints, and (3) practically reviewable.
- Practically Reviewable: Information is provided by the source in a manner and in a form that, upon examination, yields information relevant to the Property without the need for extraordinary analysis of irrelevant data.
- Business Environmental Risk: A risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in Practice E1527.
- Data Gap: A lack of or inability to obtain information required by this practice despite good faith efforts by the EP to gather such information.
- Good Faith: The absence of any intention to see an unfair advantage or to defraud another party; an honest and sincere intention to fulfill one's obligations in the conduct or transaction concerned.



APPENDIX A

FiguresSite Location Map
Site Features Map









Port Huron, MI

APPENDIX B

Site Photographs



PHOTO LOG

2654 20th Street, Port Huron, Michigan



Photo 1. Property viewed from 20th Street



Photo 2. South portion of Property looking east



Photo 3. Canopy and truck bay area at southeast corner of building





Photo 4. Compressor room and pad-mounted transformers northeast side of building



Photo 5. Exterior staining resulting from compressor leakage, east side of compressor room



Photo 6. Roll-off general waste dumpster and scrap metal dumpster southeast of building





Photo 7. Property viewed to the west from the east boundary



Photo 8. Exhaust for a vacuum system that operated part of routing plastic sheets; east exterior



Photo 9. Northwest side of building: HVAC units





Photo 10. Front office area



Photo 11. Cafeteria



Photo 12. Air-conditioned shop area at northwest corner





Photo 13. Original shop area



Photo 14. Re-enforced concrete in AC shop area



Photo 15. Multiple concrete scars in the north portion of the original shop area





Photo 16. Staining observed at cracked/cut concrete areas in the original north shop area



Photo 17. Compressor room with heavy staining along the east wall



Photo 18. Remnant of plastic piece collection system in 1994 shop addition





Photo 19. Gear lube drum and oil containers stored in shop addition for removal



Photo 20. 1994 shop addition



Photo 21. Southwest portion of the original area





Photo 22. Mezzanine area

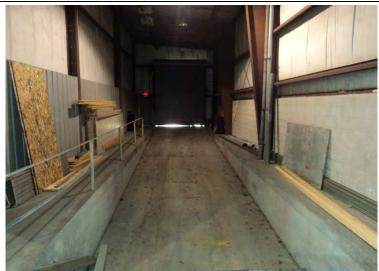


Photo 23. 1994 truck well addition at southeast corner



Photo 24. Drum storage in southeast original shop





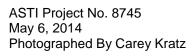
Photo 25. East adjoining 2655 16th



Photo 26. North adjoining 2626 20th



Photo 27. South adjoining 2660 20th





2654 20th Street, Port Huron, Michigan



Photo 28. West adjoining 2735 20th



APPENDIX C

User-Provided Information
User Questionnaire
Property Information Sheet



E1527 USER QUESTIONNAIRE

In order to qualify for one of the Landowner Liability Protections (LLPs) offered by the Small Business Liability Relief and Brownfield's Revitalization Act of 2001 (the "Brownfields Amendments"), the User must conduct the following inquiries required by 40 CRF 312.25, 312.28, 312.29, 312.30, and 312.31. Failure to provide knowledge pertaining to this information could result in a determination that "all appropriate inquiry" is not completed. Please complete this questionnaire and return via email or fax to 810-225-3800. Details regarding "yes" responses should be provided with a brief explanation in the comment section.

| Respondent Name: Jeffrey Sheehan | Signature: | Joffroy Shochan |
|-------------------------------------|---------------|-----------------|
| _{Date:} May 5 2014 | | |
| Subject Property Address: 2654 20th | Port Huron MI | |
| ASTI Project # | | |

Please answer all questions to the best of your knowledge and in good faith. Please provide details on comments to "yes" responses.

| Question | | Response | | Comments |
|----------|--|----------|----------|----------|
| | Question | Yes | No | Comments |
| 1 | Did a search of recorded land title records identify any environmental liens filed or recorded against the property under federal, tribe, state, or local law? | | | |
| 2 | Did a search of recorded land title records identify any Activity and Land Use Limitations such as engineering controls, land use restrictions, or institutional controls that are in place and/or have been filed in a recorded registry under federal, tribe, state, or local law? | | ✓ | |
| 3 | Do you have specialized knowledge or experiences related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and process used by this type of business? | | ✓ | |
| 4 | Is the purchase price significantly lower than the fair market value of the property? If you conclude there is a difference, have you considered whether a lower price is due to contamination known or believed to be present? | | \ | |

| | | Question | Resp | onse | Comments |
|---|-------------------------------------|---|------|--------------|----------|
| | | | Yes | No | |
| 5 | reaso the pr enviro condit | ou aware of commonly known or nably ascertainable information about operty that would help the onmental professional to identify tions indicative of a release or ened release? | | ✓ | |
| | 5a | Do you know past uses of the property? | | \checkmark | |
| | 5b | Do you know specific chemicals that are present or once were present at the property? | | / | |
| | 5c | Do you know of spills or chemical releases that have occurred at the property? | | | |
| | 5d | Do you know of any environmental cleanups that have taken place at the Property? | | | |
| | 5e | Are there any obvious indicators that point to the presence or likely presence of contamination at the property? | | ✓ | |
| 6 | | ou aware of any prior environmental igation reports that may be available view? | | | |

2654 20th Street

2654 20th Street, Port Huron, MI 48060

2001124 Listing ID: Status: Active

Industrial For Sale Property Type:

Industrial Type: Industrial-Business Park, Manufacturing

23,735 SF Size: Sale Price: \$550,000 Unit Price: \$23.17 PSF Cash to Seller Sale Terms: 1 Dock, 1 Door Loading:

Ceiling: 18 ft. Drive-In Bays: 1 Bay

Property Overview

Nice factory with enclosed truck well, lots of room to expand.





Listing Details

General Information

2654 20th Street Listing Name: Tax ID Number/APN: 00-000-0000-000

Industrial Type: Industrial-Business Park, Manufacturing,

Research & Development, Warehouse/Distribution

Property Use Type: **Business** Zoning:

INDUSTRIAL Building Size (RSF): 23.735 SF Land Area: 3.66 Acres Sale Terms: Cash to Seller

Area & Location

Market Type: Medium Beard Street and Dove Street Property Located Between:

Side of Street: East Road Type: Highway Transportation: Highway Access: Airports:

Area Description:

Bus, Rail, Highway, Airport, Taxi I-94/I-69 St. Clair County International Airport

95% Industrial 5% Residential

Building Related

Total Number of Buildings: 1 Clear Height: 18 Number of Stories: Loading Doors: 1 1 Typical SF / Floor: 23,735 SF Loading Docks:

1 Drive-In Bays: **Property Condition:** Good 1 Year Built: 480 1967 Volts: 1991 3 Year Renovated: X-Phase: Roof Type: Heat Type: Construction/Siding: Metal Siding, Steel Frame

Exterior Description: Large parking area, room to expand. Brick front on

office area.

Parking Type: Surface Parking Description: 15,180 sq.ft. paved

90 **Total Parking Spaces:** 18 Ceiling Height:

Gas Heat Source: **Ceiling Units** Air Conditioning: Package Unit Lighting: Fluorescent Internet Access: Cable, Dialup

Interior Description: Offices - 1,413 sq.ft, 2 bathrooms Shop - 1

bathroom

Land Related

Zoning Description: Industrial Topography: Level Mixed Lot Frontage (Feet): 250 Soil Type: Lot Depth: 637 Legal Description: In Office

Location

Address: 2654 20th Street, Port Huron, MI 48060

County: Saint Clair

MSA: Detroit-Warren-Livonia



Property Images



2654_20th_Street

Property Contacts



Don Cole
Kramer Commercial Realty
810-434-2535 [M]
810-987-4622 [O]
dcole@kramercommercial.com

APPENDIX D

Regulatory Records Documentation

The EDR Radius Map Report with GeoCheck (5-6-14)
DEQ and LARA File Documentation
St. Clair County Health Department Response
City of Port Huron Fire Department Response
City of Port Huron Assessing Records
City of Port Huron Building Department Records
DEQ Perfected Environmental Liens (1-24-14)



2654 20th St 2654 20th St Port Huron, MI 48060

Inquiry Number: 3925559.2s

May 06, 2014

The EDR Radius Map™ Report with GeoCheck®

Prepared using the EDR FieldCheck® System

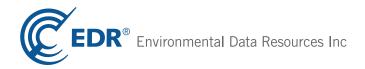


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Thank you for your business. Please contact EDR at 1-800-352-0050 with any questions or comments.

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TARGET PROPERTY INFORMATION

ADDRESS

2654 20TH ST PORT HURON, MI 48060

COORDINATES

Latitude (North): 42.9541000 - 42° 57' 14.76" Longitude (West): 82.4455000 - 82° 26' 43.80"

Universal Tranverse Mercator: Zone 17 UTM X (Meters): 382087.8 UTM Y (Meters): 4756516.5

Elevation: 610 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

42082-H4 PORT HURON, MI CA08 Target Property Map:

Most Recent Revision: 1991

AERIAL PHOTOGRAPHY IN THIS REPORT

Photo Year: 2012 Source: **USDA**

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following records. For more information on this property see page 7.

EPAID Site Database(s)

WIRTZ MFG CO INC 2654 20TH ST PORT HURON, MI 48060

RCRA NonGen / NLR

MID985566165

DATABASES WITH NO MAPPED SITES

No sites were identified in following databases.

STANDARD ENVIRONMENTAL RECORDS

| Federal NPL site list | |
|-------------------------------|--|
| NPL | |
| Proposed NPL | Proposed National Priority List Sites |
| NPL LIENS | - Federal Superfund Liens |
| Federal Delisted NPL site lis | st |
| Delisted NPL | National Priority List Deletions |
| Federal CERCLIS list | |
| CERCLIS. | . Comprehensive Environmental Response, Compensation, and Liability Information System |
| FEDERAL FACILITY | Federal Facility Site Information listing |
| Federal RCRA generators li | st |
| RCRA-LQG | RCRA - Large Quantity Generators |
| Federal institutional control | ls / engineering controls registries |
| US ENG CONTROLS | . Engineering Controls Sites List |
| | Sites with Institutional Controls Land Use Control Information System |
| L0010 | Land Use Control Information Cystem |
| Federal ERNS list | |
| ERNS | Emergency Response Notification System |
| | |
| | or solid waste disposal site lists |
| MI SWF/LF | Solid Waste Facilities Database |
| State and tribal leaking stor | rage tank lists |
| INDIAN LUST | Leaking Underground Storage Tanks on Indian Land |
| | |
| State and tribal registered s | |
| INDIAN UST | . Underground Storage Tanks on Indian Land |
| FEINIA UST | Underground Storage Tank Listing |
| State and tribal voluntary cl | leanup sites |
| INDIAN VCP | Voluntary Cleanup Priority Listing |
| State and tribal Brownfields | s sites |
| MI BROWNFIELDS | Brownfields and UST Site Database |
| | |

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS..... A Listing of Brownfields Sites

Local Lists of Landfill / Solid Waste Disposal Sites

ODI..... Open Dump Inventory

DEBRIS REGION 9...... Torres Martinez Reservation Illegal Dump Site Locations

MI SWRCY..... Recycling Facilities

MI HIST LF..... Inactive Solid Waste Facilities

INDIAN ODI_____ Report on the Status of Open Dumps on Indian Lands

Local Lists of Hazardous waste / Contaminated Sites

US HIST CDL..... National Clandestine Laboratory Register

Local Land Records

LIENS 2..... CERCLA Lien Information

MI LIENS..... Lien List

Records of Emergency Release Reports

HMIRS..... Hazardous Materials Information Reporting System

MI SPILLS..... Pollution Emergency Alerting System

Other Ascertainable Records

CONSENT..... Superfund (CERCLA) Consent Decrees

TRIS...... Toxic Chemical Release Inventory System

TSCA...... Toxic Substances Control Act

FTTS......FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide

Act)/TSCA (Toxic Substances Control Act)

HIST FTTS..... FIFRA/TSCA Tracking System Administrative Case Listing

SSTS..... Section 7 Tracking Systems

ICIS...... Integrated Compliance Information System

RMP..... Risk Management Plans

MI UIC...... Underground Injection Wells Database

MI DRYCLEANERS..... Drycleaning Establishments

INDIAN RESERV..... Indian Reservations

SCRD DRYCLEANERS...... State Coalition for Remediation of Drycleaners Listing

MI Financial Assurance Information Listing

MI COAL ASH..... Coal Ash Disposal Sites

2020 COR ACTION...... 2020 Corrective Action Program List

LEAD SMELTERS..... Lead Smelter Sites

PCB TRANSFORMER...... PCB Transformer Registration Database

COAL ASH EPA..... Coal Combustion Residues Surface Impoundments List

COAL ASH DOE..... Steam-Electric Plant Operation Data

EPA WATCH LIST..... EPA WATCH LIST

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP..... EDR Proprietary Manufactured Gas Plants EDR US Hist Cleaners..... EDR Exclusive Historic Dry Cleaners

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

| MI RGA LUST | Recovered Government Archive Leaking Underground Storage Tank |
|-------------|--|
| MI RGA LF | Recovered Government Archive Solid Waste Facilities List |
| MI RGA HWS | Recovered Government Archive State Hazardous Waste Facilities List |

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified in the following databases.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property.

Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in **bold italics** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

STANDARD ENVIRONMENTAL RECORDS

Federal RCRA CORRACTS facilities list

CORRACTS: CORRACTS is a list of handlers with RCRA Corrective Action Activity. This report shows which nationally-defined corrective action core events have occurred for every handler that has had corrective action activity.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the CORRACTS list, as provided by EDR, and dated 03/11/2014 has revealed that there is 1 CORRACTS site within approximately 1 mile of the target property.

| Lower Elevation | Address | Direction / Distance | Map ID | Page |
|--------------------------------|--------------|-------------------------|--------|------------|
| PRESTOLITE WIRE CORP PORT HURO | 3529 24TH ST | SSW 1/2 - 1 (0.855 mi.) | 32 | <i>7</i> 9 |

Federal RCRA generators list

RCRA-SQG: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the RCRA-SQG list, as provided by EDR, and dated 03/11/2014 has revealed that there are 3 RCRA-SQG sites within approximately 0.25 miles of the target property.

| Equal/Higher Elevation | Address | Direction / Distance | Map ID | Page |
|--|----------------------------------|--|------------------|-----------------|
| MICHIGAN METAL COATINGS CO NJT ENTERPRISES LLC | 2015 DOVE ST 2100 DOVE ST | SW 0 - 1/8 (0.091 mi.) SW 1/8 - 1/4 (0.142 mi.) | D11 19 | 24 47 |
| Lower Elevation | Address | Direction / Distance | Map ID | Page |
| MAG IAS LLC | 2555 20TH ST | NNW 0 - 1/8 (0.098 mi.) | E12 | 28 |

RCRA-CESQG: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the RCRA-CESQG list, as provided by EDR, and dated 03/11/2014 has revealed that there are 5 RCRA-CESQG sites within approximately 0.25 miles of the target property.

| Equal/Higher Elevation | Address | Direction / Distance | Map ID | Page |
|--------------------------------|--------------|---------------------------|-------------|------|
| BLACK RIVER MFG INC | 2625 20TH ST | WNW 0 - 1/8 (0.059 mi.) | 3 | 10 |
| CHASSIS CORPORATION OF MICHIGA | 2223 DOVE ST | WSW 1/8 - 1/4 (0.217 mi.) | <i>1</i> 25 | 64 |
| Lower Elevation | Address | Direction / Distance | Map ID | Page |
| MASCOTECH ACCESSORIES | 1721 DOVE ST | SE 0 - 1/8 (0.084 mi.) | C8 | 15 |
| PENSKE TRUCK LEASING CO LP | 1900 DOVE ST | SSW 1/8 - 1/4 (0.171 mi.) | 21 | 54 |
| SMITH EARL DISTRIBUTING CO | 1730 DOVE ST | SSE 1/8 - 1/4 (0.182 mi.) | H22 | 58 |

State- and tribal - equivalent CERCLIS

MI SHWS: The State Hazardous Waste Sites records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. The data come from the Department of Environmental Quality's' Contaminated Sites List on Diskette With Address.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the MI SHWS list, as provided by EDR, and dated 10/01/2013 has revealed that there are 5 MI SHWS sites within approximately 1 mile of the target property.

| Equal/Higher Elevation | Address | Direction / Distance | Map ID | Page |
|---|--|--|------------|----------|
| ANCHOR RECYCLING Facility Status: Remedial Action In prog | 2829 GOULDEN STREET gress | SW 1/2 - 1 (0.915 mi.) | 34 | 89 |
| Lower Elevation | Address | Direction / Distance | Map ID | Page |
| ST. CLAIR METAL PRODUCTS CO Facility Status: Inactive - no actions tak | 1721 DOVE ST en to address contamination | SE 0 - 1/8 (0.084 mi.) | C 9 | 19 |
| GRAND TRUNK RAILROAD Facility Status: Interim Response in pro Facility Status: Inactive - no actions tak | • | NW 1/2 - 1 (0.820 mi.) | 31 | 78 |
| PRESTOLITE WIRE CORP PORT HURO GIBRALTAR SPROCKET CO Facility Status: Interim Response in pro | 3592 MILITARY ST | SSW 1/2 - 1 (0.855 mi.) SSW 1/2 - 1 (0.913 mi.) | 32 33 | 79 87 |

State and tribal leaking storage tank lists

MI LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Environmental Quality's Leaking Underground Storage Tank (LUST) Database.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the MI LUST list, as provided by EDR, and dated 02/01/2014 has revealed that there are 7 MI LUST sites within approximately 0.5 miles of the target property.

| Lower Elevation | Address | Direction / Distance | Map ID | Page |
|---|--------------------|---------------------------|------------|------|
| ST. CLAIR METAL PRODUCTS CO Facility Status: Closed | 1721 DOVE ST | SE 0 - 1/8 (0.084 mi.) | C 9 | 19 |
| COCA-COLA BOTTLING CO OF MI. Facility Status: Closed | 1608 DOVE ST | SE 1/8 - 1/4 (0.165 mi.) | 20 | 53 |
| PENSKE TRUCK LEASING CO LP Facility Status: Closed | 1900 DOVE ST | SSW 1/8 - 1/4 (0.171 mi.) | 21 | 54 |
| EARL SMITH DISTRIBUTING Facility Status: Closed Facility Status: Open | 1730 DOVE ST | SSE 1/8 - 1/4 (0.186 mi.) | H23 | 60 |
| EARL C. SMITH INC Facility Status: Closed | 1720 DOVE ST | SSE 1/8 - 1/4 (0.194 mi.) | 24 | 62 |
| BLUE WATER AREA TRANS COMMISSI Facility Status: Closed | 2021 CLEVELAND AVE | SSW 1/8 - 1/4 (0.230 mi.) | 27 | 69 |

| Lower Elevation | Address | Direction / Distance | Map ID | Page |
|---|------------------|--------------------------|--------|-----------|
| SUNRISE STORE #53 Facility Status: Closed | 2319 24TH STREET | NW 1/4 - 1/2 (0.418 mi.) | 29 | 72 |

State and tribal registered storage tank lists

MI UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Environmental Quality's Michigan UST database.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the MI UST list, as provided by EDR, and dated 02/01/2014 has revealed that there are 9 MI UST sites within approximately 0.25 miles of the target property.

| Lower Elevation | Address | Direction / Distance | Map ID | Page | |
|--------------------------------|--------------------|---------------------------|--------|------|--|
| ST. CLAIR METAL PRODUCTS CO | 1721 DOVE ST | SE 0 - 1/8 (0.084 mi.) | C9 | 19 | |
| THE CROSS CO | 2555 20TH ST | NNW 0 - 1/8 (0.098 mi.) | E13 | 31 | |
| RIVERSIDE METAL PRODUCTS CO | 1631 DOVE ST | ESE 0 - 1/8 (0.112 mi.) | F14 | 32 | |
| COCA-COLA BOTTLING CO OF MI. | 1608 DOVE ST | SE 1/8 - 1/4 (0.165 mi.) | 20 | 53 | |
| PENSKE TRUCK LEASING CO LP | 1900 DOVE ST | SSW 1/8 - 1/4 (0.171 mi.) | 21 | 54 | |
| EARL SMITH DISTRIBUTING | 1730 DOVE ST | SSE 1/8 - 1/4 (0.186 mi.) | H23 | 60 | |
| EARL C. SMITH INC | 1720 DOVE ST | SSE 1/8 - 1/4 (0.194 mi.) | 24 | 62 | |
| BLUE WATER AREA TRANS COMMISSI | 2021 CLEVELAND AVE | SSW 1/8 - 1/4 (0.230 mi.) | 27 | 69 | |
| BLUE WATER AREA TRANS COMMISSI | 1805 CLEVELAND AVE | S 1/8 - 1/4 (0.240 mi.) | 28 | 71 | |

MI AST: The Aboveground Storage Tank database contains registered ASTs. The data come from the Department of Natural Resources' Michigan AST database.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the MI AST list, as provided by EDR, and dated 02/14/2014 has revealed that there is 1 MI AST site within approximately 0.25 miles of the target property.

| Lower Elevation | Address | Direction / Distance | Map ID | Page |
|----------------------------|--------------|---------------------------|--------|------|
| PENSKE TRUCK LEASING CO LP | 1900 DOVE ST | SSW 1/8 - 1/4 (0.171 mi.) | 21 | 54 |

State and tribal institutional control / engineering control registries

MI AUL: A listing of sites with institutional and/or engineering controls in place.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the MI AUL list, as provided by EDR, and dated 03/04/2014 has revealed that there is 1 MI AUL site within approximately 0.5 miles of the target property.

| Lower Elevation | Address | Direction / Distance | Map ID | Page | |
|-----------------------------|--------------|------------------------|--------|------|--|
| ST. CLAIR METAL PRODUCTS CO | 1721 DOVE ST | SE 0 - 1/8 (0.084 mi.) | C9 | 19 | |

ADDITIONAL ENVIRONMENTAL RECORDS

Local Lists of Hazardous waste / Contaminated Sites

MI DEL SHWS: Sites that have been delisted or deleted from the List of Contaminated Sites. The available documentation for the site does support it's listing or the site no longer meets criteria specified in rules.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the MI DEL SHWS list, as provided by EDR, and dated 08/01/2013 has revealed that there is 1 MI DEL SHWS site within approximately 1 mile of the target property.

| Lower Elevation | Address | Direction / Distance | Map ID | Page | |
|----------------------|------------------|-----------------------|--------|------|--|
| ALL STAR VENDING INC | 3443 MILITARY ST | S 1/2 - 1 (0.729 mi.) | 30 | 76 | |

Other Ascertainable Records

RCRA NonGen / NLR: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the RCRA NonGen / NLR list, as provided by EDR, and dated 03/11/2014 has revealed that there are 5 RCRA NonGen / NLR sites within approximately 0.25 miles of the target property.

| Lower Elevation | Address | Direction / Distance | Map ID | Page | |
|--------------------------------|------------------|-------------------------|--------|------|--|
| UNITED TECHNOLOGIES AUTOMOTIVE | 2626 20TH STREET | NNW 0 - 1/8 (0.023 mi.) | A2 | 8 | |
| HURON ST CLAIR | 2655 16TH ST | E 0 - 1/8 (0.062 mi.) | B5 | 13 | |
| THE CROWN GROUP | 1631 DOVE ST | ESE 0 - 1/8 (0.112 mi.) | F15 | 33 | |
| SBR PRINTING USA | 1906 DOVE ST | S 0 - 1/8 (0.123 mi.) | 16 | 38 | |
| BLACK RIVER PLASTICS | 2611 16TH ST | ENE 0 - 1/8 (0.125 mi.) | G18 | 45 | |

NY MANIFEST: Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the NY MANIFEST list, as provided by EDR, has revealed that there is 1 NY MANIFEST site within approximately 0.25 miles of the target property.

| Lower Elevation | Lower Elevation Address | | Map ID | Page |
|-----------------------|-------------------------|------------------------|--------|------|
| MASCOTECH ACCESSORIES | 1721 DOVE ST | SE 0 - 1/8 (0.084 mi.) | C8 | 15 |

MI BEA: A BEA is a document that new or prospective property owners/operations disclose to the DEQ identifying the property as a facility pursuant to Part 201 and Part 213. The Inventory of BEA Facilities overlaps in part with the Part 201 Projects facilities and Part 213 facilities. There may be more than one BEA for each facility.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the MI BEA list, as provided by EDR, and dated 08/21/2013 has revealed that there are 5 MI BEA sites within approximately 0.5 miles of the target property.

| Equal/Higher Elevation | Address | Direction / Distance | Map ID | Page | |
|--------------------------------|-----------------------|---------------------------|--------|------|--|
| AUTOMOTIVE PROPERTIES OF NEW Y | 2223 DOVE STREET | WSW 1/8 - 1/4 (0.217 mi.) | 126 | 68 | |
| Lower Elevation | Address | Direction / Distance | Map ID | Page | |
| FORMER ADVANCED ACCESSORY SYST | 2655 SIXTEENTH STREET | E 0 - 1/8 (0.062 mi.) | B4 | 12 | |
| ADVANCED ACCESSORY SYSTEMS (FO | 2655 16TH STREET | E 0 - 1/8 (0.062 mi.) | B7 | 14 | |
| ST. CLAIR METAL PRODUCTS CO | 1721 DOVE ST | SE 0 - 1/8 (0.084 mi.) | C9 | 19 | |
| SMR AUTOMOTIVE SYSTEMS USA, IN | 2655 SIXTEENTH STREET | E 0 - 1/8 (0.123 mi.) | G17 | 45 | |

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

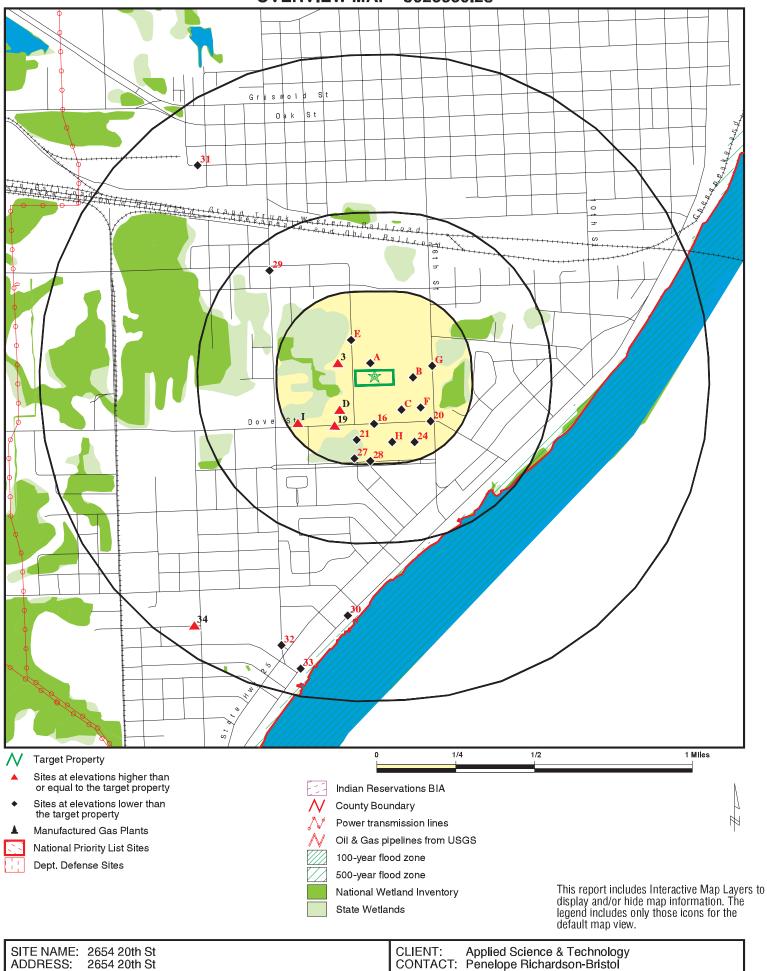
EDR US Hist Auto Stat: EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

An online review and analysis by APPLIED SCIENCE & TECHNOLOGY of the EDR US Hist Auto Stat list, as provided by EDR, has revealed that there are 2 EDR US Hist Auto Stat sites within approximately 0.25 miles of the target property.

| Equal/Higher Elevation | Address | Direction / Distance | Map ID | Page 24 Page | |
|------------------------|--------------|------------------------|--------|--------------|--|
| Not reported | 2015 DOVE ST | SW 0 - 1/8 (0.091 mi.) | D10 | | |
| Lower Elevation | Address | Direction / Distance | Map ID | | |
| Not reported | 2655 16TH ST | E 0 - 1/8 (0.062 mi.) | В6 | 14 | |

There were no unmapped sites in this report.

OVERVIEW MAP - 3925559.2s



LAT/LONG: 42.9541 / 82.4455 DATE: May 06, 2014 4:36 pm

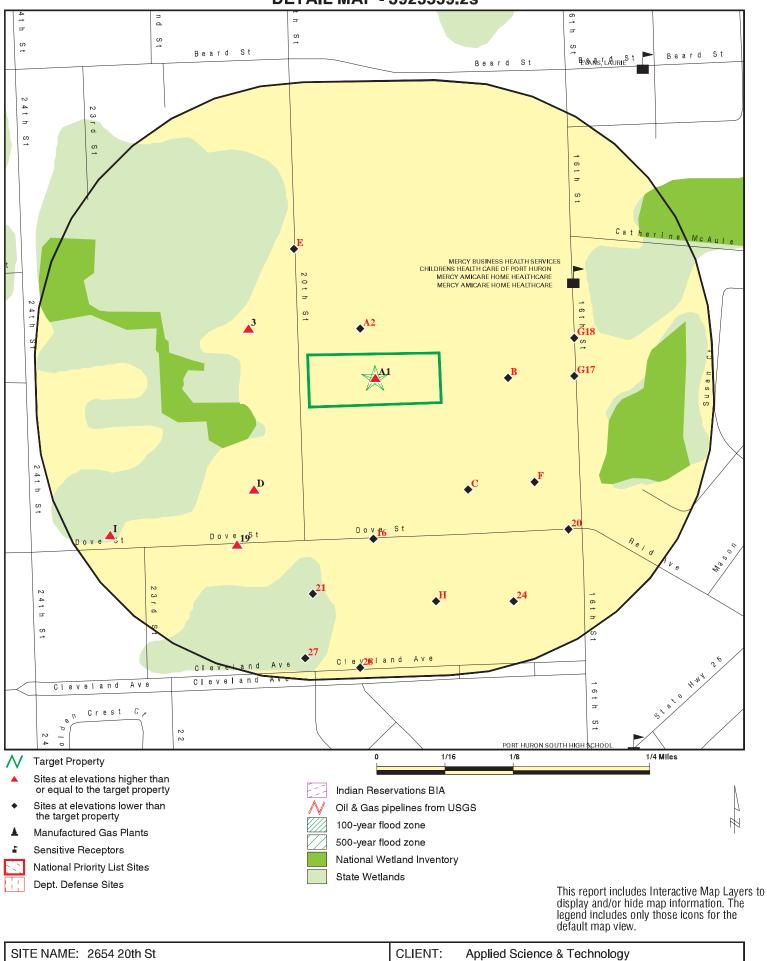
Copyright © 2014 EDR, Inc. © 2010 Tele Atlas Rel. 07/2009.

INQUIRY #:

3925559.2s

Port Huron MI 48060

DETAIL MAP - 3925559.2s



DATE: May 06, 2014 4:41 pm

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CONTACT:

INQUIRY #:

Penelope Richardson-Bristol

3925559.2s

ADDRESS:

LAT/LONG:

2654 20th St

Port Huron MI 48060

42.9541 / 82.4455

MAP FINDINGS SUMMARY

| Database | Search Distance (Miles) | Target Property | < 1/8 | 1/8 - 1/4 | 1/4 - 1/2 | 1/2 - 1 | > 1 | Total Plotted |
|--|-------------------------------|--------------------|--------------|--------------|----------------|----------------|----------------|------------------|
| STANDARD ENVIRONMENT | AL RECORDS | | | | | | | |
| Federal NPL site list | | | | | | | | |
| NPL Proposed NPL NPL LIENS | 1.000 1.000 TP | | 0 0 NR | 0 0 NR | 0 0 NR | 0 0 NR | NR NR NR | 0 0 0 |
| Federal Delisted NPL site | e list | | | | | | | |
| Delisted NPL | 1.000 | | 0 | 0 | 0 | 0 | NR | 0 |
| Federal CERCLIS list | | | | | | | | |
| CERCLIS FEDERAL FACILITY | 0.500 0.500 | | 0 0 | 0 0 | 0 0 | NR NR | NR NR | 0 0 |
| Federal CERCLIS NFRAF | site List | | | | | | | |
| CERC-NFRAP | 0.500 | | 0 | 0 | 0 | NR | NR | 0 |
| Federal RCRA CORRACT | TS facilities li | st | | | | | | |
| CORRACTS | 1.000 | | 0 | 0 | 0 | 1 | NR | 1 |
| Federal RCRA non-CORI | RACTS TSD f | acilities list | | | | | | |
| RCRA-TSDF | 0.500 | | 0 | 0 | 0 | NR | NR | 0 |
| Federal RCRA generator | s list | | | | | | | |
| RCRA-LQG RCRA-SQG RCRA-CESQG | 0.250 0.250 0.250 | | 0 2 2 | 0 1 3 | NR NR NR | NR NR NR | NR NR NR | 0 3 5 |
| Federal institutional con- engineering controls reg | | | | | | | | |
| US ENG CONTROLS US INST CONTROL LUCIS | 0.500 0.500 0.500 | | 0 0 0 | 0 0 0 | 0 0 0 | NR NR NR | NR NR NR | 0 0 0 |
| Federal ERNS list | | | | | | | | |
| ERNS | TP | | NR | NR | NR | NR | NR | 0 |
| State- and tribal - equiva | lent CERCLIS | ; | | | | | | |
| MI SHWS | 1.000 | | 1 | 0 | 0 | 4 | NR | 5 |
| State and tribal landfill a solid waste disposal site | | | | | | | | |
| MI SWF/LF | 0.500 | | 0 | 0 | 0 | NR | NR | 0 |
| State and tribal leaking s | storage tank li | ists | | | | | | |
| MI LUST INDIAN LUST | 0.500 0.500 | | 1 0 | 5 0 | 1 0 | NR NR | NR NR | 7 0 |
| State and tribal registere | ed storage tan | k lists | | | | | | |
| MI UST | 0.250 | | 3 | 6 | NR | NR | NR | 9 |

MAP FINDINGS SUMMARY

| Database | Search Distance (Miles) | Target Property | < 1/8 | 1/8 - 1/4 | 1/4 - 1/2 | 1/2 - 1 | > 1 | Total Plotted |
|--|--|--------------------|-----------------------------|-----------------------------|------------------------------|-------------------------------|----------------------------------|----------------------------|
| MI AST INDIAN UST FEMA UST | 0.250 0.250 0.250 | | 0 0 0 | 1 0 0 | NR NR NR | NR NR NR | NR NR NR | 1 0 0 |
| State and tribal institution control / engineering control / | | | | | | | | |
| MI AUL | 0.500 | | 1 | 0 | 0 | NR | NR | 1 |
| State and tribal voluntar | y cleanup sites | 5 | | | | | | |
| INDIAN VCP | 0.500 | | 0 | 0 | 0 | NR | NR | 0 |
| State and tribal Brownfie | elds sites | | | | | | | |
| MI BROWNFIELDS | 0.500 | | 0 | 0 | 0 | NR | NR | 0 |
| ADDITIONAL ENVIRONMEN | NTAL RECORDS | | | | | | | |
| ADDITIONAL ENVIRONMEN | TIAL REGORDS | | | | | | | |
| Local Brownfield lists | | | | | | | | |
| US BROWNFIELDS | 0.500 | | 0 | 0 | 0 | NR | NR | 0 |
| Local Lists of Landfill / S Waste Disposal Sites | Solid | | | | | | | |
| ODI DEBRIS REGION 9 MI SWRCY MI HIST LF INDIAN ODI | 0.500 0.500 0.500 0.500 0.500 | | 0 0 0 0 | 0 0 0 0 | 0 0 0 0 | NR NR NR NR NR | NR NR NR NR NR | 0 0 0 0 |
| Local Lists of Hazardous Contaminated Sites | s waste / | | | | | | | |
| US CDL MI DEL SHWS MI CDL US HIST CDL | TP 1.000 TP TP | | NR 0 NR NR | NR 0 NR NR | NR 0 NR NR | NR 1 NR NR | NR NR NR NR | 0 1 0 0 |
| Local Land Records | | | | | | | | |
| LIENS 2 MI LIENS | TP TP | | NR NR | NR NR | NR NR | NR NR | NR NR | 0 0 |
| Records of Emergency I | Release Report | ts | | | | | | |
| HMIRS MI SPILLS | TP TP | | NR NR | NR NR | NR NR | NR NR | NR NR | 0 0 |
| Other Ascertainable Rec | cords | | | | | | | |
| RCRA NonGen / NLR DOT OPS DOD FUDS CONSENT ROD UMTRA | 0.250 TP 1.000 1.000 1.000 1.000 0.500 | 1 | 5 NR 0 0 0 0 | 0 NR 0 0 0 0 | NR NR 0 0 0 0 | NR NR 0 0 0 NR | NR NR NR NR NR NR | 6 0 0 0 0 0 |

MAP FINDINGS SUMMARY

| Database | Search Distance (Miles) | Target Property | < 1/8 | 1/8 - 1/4 | 1/4 - 1/2 | 1/2 - 1 | > 1 | Total Plotted |
|-------------------------------|-------------------------------|--------------------|----------|-----------|-----------|----------|----------|------------------|
| US MINES | 0.250 | | 0 | 0 | NR | NR | NR | 0 |
| TRIS | TP | | NR | NR | NR | NR | NR | 0 |
| TSCA | TP | | NR | NR | NR | NR | NR | Õ |
| FTTS | TP | | NR | NR | NR | NR | NR | Ö |
| HIST FTTS | TP | | NR | NR | NR | NR | NR | Ö |
| SSTS | TP | | NR | NR | NR | NR | NR | 0 |
| ICIS | TP | | NR | NR | NR | NR | NR | 0 |
| PADS | TP | | NR | NR | NR | NR | NR | 0 |
| MLTS | TP | | NR | NR | NR | NR | NR | 0 |
| RADINFO | TP | | NR | NR | NR | NR | NR | 0 |
| FINDS | TP | | NR | NR | NR | NR | NR | 0 |
| RAATS | TP | | NR | NR | NR | NR | NR | 0 |
| RMP | TP | | NR | NR | NR | NR | NR | 0 |
| MI UIC | TP | | NR | NR | NR | NR | NR | 0 |
| NY MANIFEST MI DRYCLEANERS | 0.250 | | 1 0 | 0 | NR | NR | NR | 1 |
| MI NPDES | 0.250 TP | | NR | 0 NR | NR NR | NR NR | NR NR | 0 0 |
| MI AIRS | TP | | NR | NR | NR | NR | NR | 0 |
| MI BEA | 0.500 | | 4 | 1 | 0 | NR | NR | 5 |
| INDIAN RESERV | 1.000 | | Ö | Ö | ŏ | 0 | NR | 0 |
| SCRD DRYCLEANERS | 0.500 | | Ö | Ö | Ö | NR | NR | Ö |
| MI Financial Assurance | TP | | NR | NR | NR | NR | NR | 0 |
| MI WDS | TP | | NR | NR | NR | NR | NR | 0 |
| MI COAL ASH | 0.500 | | 0 | 0 | 0 | NR | NR | 0 |
| 2020 COR ACTION | 0.250 | | 0 | 0 | NR | NR | NR | 0 |
| LEAD SMELTERS | TP | | NR | NR | NR | NR | NR | 0 |
| PRP | TP | | NR | NR | NR | NR | NR | 0 |
| US AIRS | TP | | NR | NR | NR | NR | NR | 0 |
| US FIN ASSUR | TP | | NR | NR | NR | NR | NR | 0 |
| PCB TRANSFORMER | TP | | NR | NR | NR | NR | NR | 0 |
| COAL ASH EPA COAL ASH DOE | 0.500 TP | | 0 NR | 0 NR | 0 NR | NR NR | NR NB | 0 |
| EPA WATCH LIST | TP | | NR NR | NR | NR | NR | NR NR | 0 0 |
| LIAWATOTILIOT | ••• | | INIX | IVIX | INIX | INIX | IVIX | O |
| EDR HIGH RISK HISTORICA | L RECORDS | | | | | | | |
| EDR Exclusive Records | | | | | | | | |
| EDR MGP | 1.000 | | 0 | 0 | 0 | 0 | NR | 0 |
| EDR US Hist Auto Stat | 0.250 | | 2 | 0 | NR | NR | NR | 2 |
| EDR US Hist Cleaners | 0.250 | | ō | Ö | NR | NR | NR | 0 |
| EDR RECOVERED GOVERN | IMENT ARCHI | VES | | | | | | |
| Exclusive Recovered Go | vt. Archives | | | | | | | |
| MI RGA LUST | TP | | NR | NR | NR | NR | NR | 0 |
| MI RGA LF | TP | | NR | NR | NR | NR | NR | 0 |
| MI RGA HWS | TP | | NR | NR | NR | NR | NR | 0 |
| | | | | | | | | • |

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

Map ID MAP FINDINGS

Direction Distance

Distance Elevation Site EDR ID Number

Database(s) EPA ID Number

A1 WIRTZ MFG CO INC RCRA NonGen / NLR 1000423646
Target 2654 20TH ST MID985566165

Property PORT HURON, MI 48060

Site 1 of 2 in cluster A

Actual: RCRA NonGen / NLR:

610 ft. Date form received by agency: 12/31/2001

Facility name: WIRTZ MFG CO INC Facility address: 2654 20TH ST

PORT HURON, MI 48060

EPA ID: MID985566165
Mailing address: PO BOX 610098

PORT HURON, MI 48061

Contact: HENRY SMITH
Contact address: 2654 20TH ST

PORT HURON, MI 48060

Contact country: US

Contact telephone: (313) 987-4700 Contact email: Not reported

EPA Region: 05

Classification: Non-Generator

Description: Handler: Non-Generators do not presently generate hazardous waste

Owner/Operator Summary:

Owner/operator country:

Owner/operator name: NO ACTIVE O/OP AS NOT GENERATING WASTE

Owner/operator address: Not reported Not reported

Not reported

Owner/operator telephone: Not reported Legal status: Private
Owner/Operator Type: Owner
Owner/Op start date: 01/01/2002
Owner/Op end date: Not reported

Owner/operator name: NO ACTIVE O/OP AS NOT GENERATING WASTE

Owner/operator address:

Owner/operator country:

Owner/operator telephone:

Legal status:

Not reported

Not reported

Not reported

Private

Owner/Operator Type: Operator
Owner/Op start date: 01/01/2002
Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No

MAP FINDINGS Map ID

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

WIRTZ MFG CO INC (Continued) 1000423646

Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: Nο

Historical Generators:

Date form received by agency: 05/23/1988

WIRTZ MFG CO INC Facility name: Small Quantity Generator Classification:

Hazardous Waste Summary:

D001 Waste code:

IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF Waste name:

> LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Violation Status: No violations found

UNITED TECHNOLOGIES AUTOMOTIVE INC. **A2** RCRA NonGen / NLR 1000398850 NNW **FINDS** MID064206444

2626 20TH STREET < 1/8 PORT HURON, MI

0.023 mi.

124 ft. Site 2 of 2 in cluster A

RCRA NonGen / NLR: Relative:

Date form received by agency: 01/01/1994 Lower Facility name: UNITED TECHNOLOGIES AUTOMOTIVE

Actual: Facility address: 2626 20TH ST

609 ft.

PORT HURON, MI 48060

EPA ID: MID064206444

Mailing address: PO BOX 827

PORT HURON, MI 48060

Contact: REBECCA SPEARUT

Contact address: 2626 20TH ST

PORT HURON, MI 48060

Contact country: US

(248) 447-1508 Contact telephone: Contact email: Not reported

EPA Region:

Land type: Other land type Classification: Non-Generator

Description: Handler: Non-Generators do not presently generate hazardous waste

Owner/Operator Summary:

Owner/operator name: NO ACTIVE O/OP AS NOT GENERATING WASTE

Owner/operator address: Not reported Not reported

Owner/operator country: Not reported Owner/operator telephone: Not reported Legal status: Private Owner/Operator Type: Operator Owner/Op start date: 01/02/1994 Owner/Op end date: Not reported Map ID MAP FINDINGS

Direction Distance

Elevation Site Database(s) EPA ID Number

UNITED TECHNOLOGIES AUTOMOTIVE INC. (Continued)

1000398850

EDR ID Number

Owner/operator name: NO ACTIVE O/OP AS NOT GENERATING WASTE

Owner/operator address: Not reported Not reported

Owner/operator country:

Owner/operator telephone:

Legal status:

Owner/Operator Type:

Owner

Owner/Op start date:

Owner/Op end date:

Not reported

Not reported

Owner

Owner

Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: Nο Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: Nο User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Historical Generators:

Date form received by agency: 08/18/1980

Facility name: UNITED TECHNOLOGIES AUTOMOTIVE

Classification: Large Quantity Generator

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Violation Status: No violations found

Evaluation Action Summary:

Evaluation date: 11/01/1988

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Not reported
Date achieved compliance: Not reported
Evaluation lead agency: State

FINDS:

Registry ID: 110002451800

Environmental Interest/Information System

Map ID MAP FINDINGS

Direction Distance

Elevation Site Database(s) EPA ID Number

UNITED TECHNOLOGIES AUTOMOTIVE INC. (Continued)

1000398850

EDR ID Number

US EPA TRIS (Toxics Release Inventory System) contains information from facilities on the amounts of over 300 listed toxic chemicals that these facilities release directly to air, water, land, or that are transported off-site.

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

3 BLACK RIVER MFG INC RCRA-CESQG 1000172921 WNW 2625 20TH ST FINDS MID083430843

< 1/8 0.059 mi. 314 ft.

Relative: RCRA-CESQG:

PORT HURON, MI

Higher Date form received by agency: 09/20/2010

Facility name: BLACK RIVER MFG INC

Actual: Facility address: 2625 20TH ST

610 ft. PORT HURON, MI 48060

EPA ID: MID083430843
Contact: MATHEW HUSTEK
Contact address: 2625 20TH ST

PORT HURON, MI 48060

Contact country: US

Contact telephone: (810) 982-9812 Contact email: Not reported

EPA Region: 05 Land type: Private

Classification: Conditionally Exempt Small Quantity Generator

Description: Handler: generates 100 kg or less of hazardous waste per calendar

month, and accumulates 1000 kg or less of hazardous waste at any time; or generates 1 kg or less of acutely hazardous waste per calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste; or generates 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or other debris resulting from

the cleanup of a spill, into or on any land or water, of acutely

hazardous waste

Owner/Operator Summary:

Owner/operator name: BLACK RIVER MFG INC

Owner/operator address: Not reported

Not reported

Owner/operator country: Not reported
Owner/operator telephone: Not reported
Legal status: Private
Owner/Operator Type: Operator

Direction Distance

Elevation Site Database(s) EPA ID Number

BLACK RIVER MFG INC (Continued)

1000172921

EDR ID Number

Owner/Op start date: 01/01/1970
Owner/Op end date: Not reported

Owner/operator name: BLACK RIVER MFG INC

Not reported

Owner/operator address: Not reported

Owner/operator country:

Owner/operator telephone:

Legal status:

Owner/Operator Type:

Owner

Owner/Op start date:

Owner/Op end date:

Not reported

Not reported

Owner

Owner

Owner

Owner

Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: Nο Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Universal Waste Summary:

Waste type: Batteries
Accumulated waste on-site: Yes
Generated waste on-site: Yes

Historical Generators:

Date form received by agency: 05/14/2003

Facility name: BLACK RIVER MFG INC Classification: Not a generator, verified

Date form received by agency: 11/01/2002

Facility name: BLACK RIVER MFG INC

Classification: Conditionally Exempt Small Quantity Generator

Date form received by agency: 06/08/1987

Facility name: BLACK RIVER MFG INC Classification: Small Quantity Generator

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

BLACK RIVER MFG INC (Continued)

1000172921

MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Facility Has Received Notices of Violations:

Regulation violated: Not reported

Generators - General Area of violation:

Date violation determined: 02/21/2001 Date achieved compliance: 03/28/2001 Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 02/21/2001 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Not reported Final penalty amount: Paid penalty amount: Not reported

Evaluation Action Summary:

Evaluation date: 02/21/2001

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - General

Date achieved compliance: 03/28/2001 Evaluation lead agency: State

FINDS:

Registry ID: 110003605705

Environmental Interest/Information System

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and

corrective action activities required under RCRA.

В4 FORMER ADVANCED ACCESSORY SYSTEMS

2655 SIXTEENTH STREET

East < 1/8 PORT HURON (CITY OF), MI 48060

0.062 mi.

328 ft. Site 1 of 4 in cluster B

BEA: Relative:

Secondary Address: Not reported Lower

BEA Number: 4701

Actual: District: Southeast MI 606 ft. Date Received: 02/09/2011

Submitter Name: NAI Farbman Petition Determination: No Request

Petition Disclosure:

Not reported Category: Determination 20107A: No Request Reviewer: barrowsg Division Assigned: RRD

MI BEA

S110748311

N/A

Direction Distance

Elevation Site Database(s) EPA ID Number

B5 HURON ST CLAIR RCRA NonGen / NLR 1000337741
East 2655 16TH ST FINDS MID061861647

< 1/8 PORT HURON, MI 48060

0.062 mi.

Actual:

606 ft.

328 ft. Site 2 of 4 in cluster B

Relative: RCRA NonGen / NLR:

Lower Date form received by agency: 08/18/1980

Facility name: HURON ST CLAIR
Facility address: 2655 16TH ST

PORT HURON, MI 48060

EPA ID: MID061861647
Contact: GARY CRONCE
Contact address: 2655 16TH ST

PORT HURON, MI 48060

Contact country: US

Contact telephone: (313) 987-2670 Contact email: Not reported

EPA Region: 05

Classification: Non-Generator

Description: Handler: Non-Generators do not presently generate hazardous waste

Owner/Operator Summary:

Owner/operator name: NO ACTIVE O/OP AS NOT GENERATING WASTE

Owner/operator address: Not reported

Not reported

Owner/operator country:

Owner/operator telephone:

Legal status:

Owner/Operator Type:

Owner/Op start date:

Owner/Op end date:

Not reported

Not reported

Operator

Operator

Othory/Op end date:

Not reported

Owner/operator name: NO ACTIVE O/OP AS NOT GENERATING WASTE

Owner/operator address:
Not reported
Not reported
Owner/operator country:
Not reported
Not reported
Not reported
Not reported
Not reported

Legal status: Private
Owner/Operator Type: Owner
Owner/Op start date: 01/03/1970
Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No **EDR ID Number**

Direction Distance

EDR ID Number Elevation Site **EPA ID Number** Database(s)

No

HURON ST CLAIR (Continued)

1000337741

Used oil transporter:

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET. WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Violation Status: No violations found

FINDS:

Registry ID: 110001844933

Environmental Interest/Information System

US EPA TRIS (Toxics Release Inventory System) contains information from facilities on the amounts of over 300 listed toxic chemicals that these facilities release directly to air, water, land, or that are

transported off-site.

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA

program staff to track the notification, permit, compliance, and

corrective action activities required under RCRA.

B6 EDR US Hist Auto Stat 1015376070

N/A

S111134794

N/A

MI BEA

MI WDS

2655 16TH ST PORT HURON, MI 48060 < 1/8

0.062 mi.

East

328 ft. Site 3 of 4 in cluster B

EDR Historical Auto Stations: Relative:

SPORTRACK AUTOMOTIVE Name: Lower

Year: 2011

Actual: Address: 2655 16TH ST

606 ft.

ADVANCED ACCESSORY SYSTEMS (FORMER) **B7**

2655 16TH STREET East PORT HURON (CITY OF), MI 48060 < 1/8

0.062 mi.

328 ft. Site 4 of 4 in cluster B

BEA: Relative:

Secondary Address: Not reported Lower

BEA Number: 5230

Actual: Southeast MI District: 606 ft. Date Received: 07/06/2012

Submitter Name: 316 Hoffman, LLC Petition Determination: No Request

Direction Distance

EDR ID Number Elevation Site **EPA ID Number** Database(s)

ADVANCED ACCESSORY SYSTEMS (FORMER) (Continued)

S111134794

1000338208

MID096963913

FINDS

US AIRS

NY MANIFEST

Petition Disclosure:

Not reported Category: Determination 20107A: No Request Reviewer: barrowsg Division Assigned: RD

WDS:

Site Id: MID061861647

WMD Id: 396631

Site Specific Name: **HURON ST CLAIR** Mailing Address: 2655 16TH ST Mailing City/State/Zip: 48060 Mailing County: ST CLAIR

C8 **MASCOTECH ACCESSORIES** RCRA-CESQG

SE **1721 DOVE ST**

< 1/8 PORT HURON, MI 48060

0.084 mi.

441 ft. Site 1 of 2 in cluster C

RCRA-CESQG: Relative:

Date form received by agency: 05/25/2004 Lower

> Facility name: SPORTRACK AUTOMOTIVE

Actual: Facility address: 1721 DOVE ST 606 ft.

PORT HURON, MI 48060 EPA ID: MID096963913

Mailing address:

2655 16TH ST PORT HURON, MI 48060

Contact: LOREN MAXON

Contact address: 1721 DOVE ST

PORT HURON, MI 48060

Contact country: US

(810) 987-2670 Contact telephone: Contact email: Not reported

EPA Region:

Classification: Conditionally Exempt Small Quantity Generator

Description: Handler: generates 100 kg or less of hazardous waste per calendar

month, and accumulates 1000 kg or less of hazardous waste at any time; or generates 1 kg or less of acutely hazardous waste per calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any

land or water, of acutely hazardous waste; or generates 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely

hazardous waste

Owner/Operator Summary:

Owner/operator name: SPORTRACK AUTOMOTIVE

Owner/operator address: Not reported

Not reported

Owner/operator country: Not reported Owner/operator telephone: Not reported

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

MASCOTECH ACCESSORIES (Continued)

1000338208

Legal status: Private Operator Owner/Operator Type: 05/25/2004 Owner/Op start date: Owner/Op end date: Not reported

ADVANCED ACESSORY SYSTEMS Owner/operator name:

Owner/operator address: Not reported Not reported

Not reported Owner/operator country: Owner/operator telephone: Not reported Private Owner

Legal status: Owner/Operator Type: Owner/Op start date: 01/01/1996 Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: Nο Underground injection activity: No On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: Nο User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Historical Generators:

Date form received by agency: 04/06/2001

SPORTRACK AUTOMOTIVE Facility name: Classification: Not a generator, verified

Date form received by agency: 02/28/1990

Facility name: SPORTRACK AUTOMOTIVE HURON/ST. CLAIR INC. Site name: Classification: Large Quantity Generator

Date form received by agency: 08/18/1980

SPORTRACK AUTOMOTIVE Facility name: Classification: Not a generator, verified

Hazardous Waste Summary:

Waste code: D001

IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF Waste name:

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Direction Distance Elevation

Site Database(s) EPA ID Number

MASCOTECH ACCESSORIES (Continued)

1000338208

EDR ID Number

Violation Status: No violations found

FINDS:

Registry ID: 110001847431

Environmental Interest/Information System

AFS (Aerometric Information Retrieval System (AIRS) Facility Subsystem) replaces the former Compliance Data System (CDS), the National Emission Data System (NEDS), and the Storage and Retrieval of Aerometric Data (SAROAD). AIRS is the national repository for information concerning airborne pollution in the United States. AFS is used to track emissions and compliance data from industrial plants. AFS data are utilized by states to prepare State Implementation Plans to comply with regulatory programs and by EPA as an input for the estimation of total national emissions. AFS is undergoing a major redesign to support facility operating permits required under Title V of the Clean Air Act.

US EPA TRIS (Toxics Release Inventory System) contains information from facilities on the amounts of over 300 listed toxic chemicals that these facilities release directly to air, water, land, or that are transported off-site.

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

NY MANIFEST:

EPA ID: MID096963913

Country: USA

Mailing Name: ST CLAIR METAL PRODUCTS COMPANY

Mailing Contact: TOM RICH

Mailing Address: 1721 DOVE STREET

Mailing Address 2: Not reported Mailing City: PORT HURON

Mailing State: MI
Mailing Zip: 48060
Mailing Zip4: Not reported
Mailing Country: USA

Mailing Phone: 313-984-5123

Document ID: NYO2280564

Manifest Status: Completed after the designated time period for a TSDF to get a copy to the DEC

Trans1 State ID: Not reported

 Trans2 State ID:
 528

 Generator Ship Date:
 821110

 Trans1 Recv Date:
 821110

 Trans2 Recv Date:
 830414

 TSD Site Recv Date:
 830421

 Part A Recv Date:
 030502

 Part B Recv Date:
 030502

Direction Distance

Elevation Site Database(s) EPA ID Number

MASCOTECH ACCESSORIES (Continued)

1000338208

EDR ID Number

 Generator EPA ID:
 MID096963913

 Trans1 EPA ID:
 MID098011992

 Trans2 EPA ID:
 MIT270012321

 TSDF ID:
 NYD057770109

 Waste Code:
 F005 - UNKNOWN

Quantity: 00250

Units: G - Gallons (liquids only)* (8.3 pounds)

Number of Containers: 005

Container Type: DM - Metal drums, barrels

Handling Method: T Chemical, physical, or biological treatment.

Specific Gravity: 100 Year: 82

AIRS (AFS):

Airs Minor Details:

EPA plant ID: 110001847431

Plant name: MASCOTECH ACCESSORIES

Plant address: 1721 DOVE ST

PORT HURON, MI 48060

County: ST CLAIR
Region code: 05
Dunn & Bradst #: Not reported
Air quality contribution: 123

Air quality cntrl region: 123 Sic code: 3429

Sic code desc: HARDWARE, NEC

North Am. industrial classf: 336399

NAIC code description: All Other Motor Vehicle Parts Manufacturing

Default compliance status: IN COMPLIANCE - INSPECTION

Default classification: POTENTIAL UNCONTROLLED EMISSIONS < 100 TONS/YEAR

Govt facility: ALL OTHER FACILITIES NOT OWNED OR OPERATED BY A FEDERAL, STATE, OR

LOCAL GOVERNMENT

Current HPV: Not reported

Compliance and Enforcement Major Issues:

Air program: SIP SOURCE
National action type: Not reported
Date achieved: 00000
Penalty amount: Not reported

Historical Compliance Minor Sources:

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1101

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1103

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1202
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - INSPECTION

Direction Distance

Elevation Site Database(s) **EPA ID Number**

MASCOTECH ACCESSORIES (Continued)

1000338208

EDR ID Number

Hist compliance date: 1204

SIP SOURCE Air prog code hist file:

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1303

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1004

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1102

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1104

SIP SOURCE Air prog code hist file:

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1201

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1203

SIP SOURCE Air prog code hist file:

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1301

SIP SOURCE Air prog code hist file:

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date:

Air prog code hist file: SIP SOURCE

Compliance & Violation Data by Minor Sources: Air program code: SIP SOURCE Plant air program pollutant: **OTHER**

Default pollutant classification: POTENTIAL UNCONTROLLED EMISSIONS < 100 TONS/YEAR

Def. poll. compliance status: IN COMPLIANCE - INSPECTION

Def. attainment/non attnmnt: Not reported Repeat violator date: Not reported Turnover compliance: Not reported

ST. CLAIR METAL PRODUCTS CO

SE **1721 DOVE ST**

PORT HURON, MI 48060 < 1/8 0.084 mi.

441 ft. Site 2 of 2 in cluster C

Relative:

Lower SHWS:

C9

Actual: Facility ID: 74000084

606 ft. **Facility Status:** Inactive - no actions taken to address contamination

> Source: Miscellaneous Metal Work

SAM Score: 26 U003322387

N/A

MI SHWS

MI LUST

MI UST

MI AUL

MI WDS

MI NPDES MI BEA

Direction Distance

Elevation Site Database(s) EPA ID Number

ST. CLAIR METAL PRODUCTS CO (Continued)

U003322387

EDR ID Number

SAM Score Date: 08/06/2004
Township: Not reported
Range: Not reported
Section: Not reported
Quarter: Not reported
Quarter/Quarter: Not reported
Pollutants: Not reported

LUST:

Facility ID: 00012081

Source: STATE OF MICHIGAN
Owner Name: Mechanical Tech Inc
Owner Address: 968 ALBANY-SHAKER RD
Owner City,St,Zip: LATHAM, NY 12110
Owner Contact: Not reported
Owner Phone: (518) 785-2211

Country: USA

District: SE Michigan District Office
Site Name: St. Clair Metal Products Co

Latitude: 42.95173 Longitude: -82.44326 Date of Collection: 01/11/2001

Method of Collection: Address Matching-House Number

Accuracy: 100
Accuracy Value Unit: FEET
Horizontal Data: NAD83
Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Leak Number: C-0288-89
Release Date: 01/01/1900
Substance Released: Not reported
Release Status: Closed
Release Closed Date: 09/24/2004

UST:

Facility ID: 00012081 Facility Type: CLOSED

Owner Name: MECHANICAL TECH INC
Owner Address: 968 ALBANY-SHAKER RD
Owner City,St,Zip: LATHAM, NY 12110

Owner Country:
Owner Contact:
Owner Phone:
Contact:
Contact:
Contact:
DEAN CUNNINGHAM
Contact Phone:
(313) 984-5123
Date of Collection:
Accuracy:
Accuracy:
DEAN CUNNINGHAM
(313) 984-5123
Date of Collection:
Contact Phone:
(313) 984-5123
Date of Collection:
Contact Phone:
(313) 984-5123
Date of Collection:
Contact Phone:
(313) 984-5123
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Contact Phone:
(313) 984-5123

Accuracy Value Unit: FEET Horizontal Datum: NAD83

Source: STATE OF MICHIGAN

Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Method of Collection: Address Matching-House Number

Latitude: 42.95173 Longitude: -82.44326

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

ST. CLAIR METAL PRODUCTS CO (Continued)

Tank ID:

Removed from Ground Tank Status:

16000 Capacity: Product: Diesel, WATER, Install Date: 03/26/1978 Remove Date: 09/01/1984 Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Galvanized Steel Piping Type: Not reported

Asphalt Coated or Bare Steel Construction Material:

Impressed Device: No

Tank ID:

Tank Status: Removed from Ground

Capacity: 1200

Hazardous Substance, Product:

Install Date: 03/27/1975 05/01/1978 Remove Date: Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Bare Steel Piping Type: Not reported

Asphalt Coated or Bare Steel Construction Material:

Impressed Device: Nο

Tank ID:

Tank Status: Removed from Ground

1200 Capacity:

Product: Hazardous Substance,

Install Date: 03/27/1975 Remove Date: 05/01/1978 Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Bare Steel Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID:

Removed from Ground Tank Status:

Capacity: 1000

Hazardous Substance Product:

Install Date: 03/26/1984 Remove Date: 11/01/1988 Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Galvanized Steel Piping Type: Not reported

Asphalt Coated or Bare Steel Construction Material:

Impressed Device: No

Tank ID: 5 U003322387

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

ST. CLAIR METAL PRODUCTS CO (Continued)

U003322387

Tank Status: Removed from Ground

1100 Capacity: Product: WATER Install Date: 03/26/1985 Remove Date: 03/26/1986 Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: **PVC**

Piping Type: Not reported

Construction Material: X-LINKED POLYOLEFINS

Impressed Device: Nο

AUL:

Status: Recorded Site Name: Not reported

Property: Sportrack Automotive (formerly Mascotech Accessories)

Land Use Restriction Type: RC Program Type: Part 213 Program Support Assigned User: Nicholas Swartz Program Support Assigned Date: 06/02/2009 Legal Description Of Property: Migrated Based On The Deg Ref #: 11121305133 MDEQ Reference Number: RC-RRD-213-05-133

Property Or Description Restricted Area: Migrated Lead Division: STD

File Name Of Hyperlinked Legal Doc: U:\\kermit\\11121305133.pdf 0.77980000000000005 Mapped Polygons Area In Acres: Mapped Polygons Area In Square Miles: 1.19999999999999995-3

Date Data Entry Started: 06/02/2009 Date Data Entry Finished: 06/02/2009

Individual Or Staff Assoc With The Mapping: Nicholas Swartz

Program Used To Map Restricted Features: ArcInfo 9.3 and IcoMap 4.2

Date Legal Paperwork Stamped/Filed/Register Of Deeds: 12/02/2003

Commercial I Land Use Restriction: 0 Commercial li Land Use Restriction: 0 Commercial lii Land Use Restriction: 0 Commercial Iv Land Use Restriction: 0 Industrial Land Use Restriction: 0 Residential Land Use Restriction: 0 Recreational Land Use Restriction: 0 Multiple Land-Use Restrictions: 0 Site Specific Restrictions: Groundwater Consumption Restrictions: 1 **Groundwater Contact Restrictions:** Special Well Construction Requirements: 0 Special Building Restrictions: **Excavation And Soil Movement Restrictions:**

0 0 Soil Movement Requirements: There Is A Restriction On All Construction: 0 Monitoring Well Protected, No Tampering Or Removal: 0 There Is An Exposure Barrier In Place: 0 There Is A Health And Safety Plan: There Is A Permanent Marker On The Site:

Map Comments: Land restriction has not been mapped in kermit as of January 29,

2008.LUR is mapped in KERMIT as of 20090602 - Nick Swartz

Comment: Request received on 8/25/2005

Direction Distance Elevation

n Site Database(s) EPA ID Number

ST. CLAIR METAL PRODUCTS CO (Continued)

U003322387

EDR ID Number

MI NPDES:

Permit Number: MIS410519

Permitee PO Box: N

Permitee Email: Not reported Issue Date: 07/20/2009
Effective Date: 07/20/2009
Expiration Date: 04/01/2014

Permittee Name: Advanced Accessory Systems

Permittee Address: 2655 16th Street
Permittee Addr2: Not reported

Permittee City, St, Zip: Port Huron, MI 48060

Permit Type: COC

Facility Name 2: Not reported Facility Name 3: Not reported Facility Name 4: Not reported

Designed Name: Advanced Accessory-Pt Huron

Latitude: 42.95383
Lat Direction: N
Lat Type Code: LAT
Longitude: -82.44417
Lon Direction: W
Lon Type Code: LON
Hydrologic Unit Code: 4090001

BEA:

Secondary Address: Not reported

BEA Number: 5231

District: Southeast MI
Date Received: 07/18/2012
Submitter Name: 316 Hoffman, LLC
Petition Determination: No Request

Petition Disclosure: 0

Category: Not reported Determination 20107A: No Request

Reviewer: barrowsg Division Assigned: RD

Secondary Address: Not reported BEA Number: 5574
District: Southeast MI Date Received: 05/07/2013

Submitter Name: 1721 Dove Street, LLC

Petition Determination: No Request

Petition Disclosure: 0

Category: Not reported
Determination 20107A: No Request
Reviewer: barrowsg
Division Assigned: RRD

Secondary Address: Not reported BEA Number: 4699

District: Southeast MI
Date Received: 02/09/2011
Submitter Name: NAI Farbman
Petition Determination: No Request

Petition Disclosure: 0

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

ST. CLAIR METAL PRODUCTS CO (Continued)

U003322387

Category: Not reported Determination 20107A: No Request barrowsg Reviewer:

Division Assigned: Storage Tank Division

Secondary Address: Not reported BEA Number: 2243 District: Southeast MI Date Received: 01/05/2004

Submitter Name: W.P. Carey & Company, LLC

Petition Determination: No Request

Petition Disclosure:

Category: Different Hazardous Substance(s)

Determination 20107A: No Request Reviewer: barrowsg

Division Assigned: **Environmental Response Division**

WDS:

Site Id: MID096963913 WMD Id: 397998

Site Specific Name: SPORTRACK AUTOMOTIVE PORT HURON FACILITY

Mailing Address: 2655 16TH ST Mailing City/State/Zip: 48060 Mailing County: ST CLAIR

D10 **EDR US Hist Auto Stat** 1015306738

N/A

MID005340997

SW **2015 DOVE ST** PORT HURON, MI 48060 < 1/8

0.091 mi.

481 ft. Site 1 of 2 in cluster D

EDR Historical Auto Stations: Relative:

JPS AUTOMOTIVE Name: Higher

Year: 2002

Actual: 2015 DOVE ST Address:

610 ft.

D11 RCRA-SQG 1000392270 **MICHIGAN METAL COATINGS CO**

SW **2015 DOVE ST**

< 1/8 PORT HURON, MI 48060

0.091 mi.

481 ft. Site 2 of 2 in cluster D

RCRA-SQG: Relative:

Date form received by agency: 12/03/2013 Higher

MICHIGAN METAL COATINGS CO Facility name:

Actual: 2015 DOVE ST Facility address:

610 ft.

PORT HURON, MI 48060

EPA ID: MID005340997 Contact: MICHAEL LENTZ Contact address: Not reported Not reported

Contact country: Not reported Contact telephone: (810) 966-9240

MIKELENTZ@MICHIGANMETALCOATINGS.NET Contact email:

EPA Region: 05 Land type: Private

Direction Distance Elevation

EDR ID Number
Site Database(s) EPA ID Number

MICHIGAN METAL COATINGS CO (Continued)

1000392270

Classification: Small Small Quantity Generator

Description: Handler: generates more than 100 and less than 1000 kg of hazardous

waste during any calendar month and accumulates less than 6000 kg of hazardous waste at any time; or generates 100 kg or less of hazardous waste during any calendar month, and accumulates more than 1000 kg of

hazardous waste at any time

Owner/Operator Summary:

Owner/operator name: METAL COATINGS INTERNATIONAL, INC

Owner/operator address:

Not reported
Not reported
Owner/operator country:

Owner/operator telephone:
Legal status:

Not reported
Not reported
Private

Owner/Operator Type: Operator
Owner/Op start date: 09/01/2006
Owner/Op end date: Not reported

Owner/operator name: WALTER WINKLE Owner/operator address: Not reported

Not reported Not reported

Owner/operator country:
Owner/operator telephone:
Legal status:
Owner/Operator Type:
Owner
Owner/Op start date:
Owner/Op end date:
Not reported
Not reported
Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Universal Waste Summary:

Waste type: Lamps
Accumulated waste on-site: Yes
Generated waste on-site: Yes

Historical Generators:

Date form received by agency: 04/18/2011

Facility name: MICHIGAN METAL COATINGS CO

Classification: Small Quantity Generator

Direction Distance

Elevation Site Database(s) EPA ID Number

MICHIGAN METAL COATINGS CO (Continued)

1000392270

EDR ID Number

Date form received by agency: 03/13/2009

Facility name: MICHIGAN METAL COATINGS CO

Classification: Small Quantity Generator

Date form received by agency: 09/01/2006

Facility name: MICHIGAN METAL COATINGS CO

Classification: Small Quantity Generator

Date form received by agency: 12/31/2001

Facility name: MICHIGAN METAL COATINGS CO

Classification: Not a generator, verified

Date form received by agency: 12/12/1991

Facility name: MICHIGAN METAL COATINGS CO

Classification: Small Quantity Generator

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Facility Has Received Notices of Violations:

Regulation violated: Not reported

Area of violation: State Statute or Regulation

Date violation determined: 09/24/2009
Date achieved compliance: 11/17/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 10/19/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Used Oil - Generators

Date violation determined: 09/24/2009
Date achieved compliance: 11/17/2009

Violation lead agency: State

Enforcement action: WRITTEN INFORMAL Enforcement action date: 10/19/2009

Enf. disposition status:

Enf. disp. status date:

Enforcement lead agency:

Proposed penalty amount:

Final penalty amount:

Paid penalty amount:

Not reported

Not reported

Not reported

Not reported

Regulation violated: Not reported

Direction Distance

Elevation Site Database(s) EPA ID Number

MICHIGAN METAL COATINGS CO (Continued)

1000392270

EDR ID Number

Area of violation: Generators - General

Date violation determined: 09/24/2009
Date achieved compliance: 11/17/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 10/19/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Pre-transport

Date violation determined: 09/24/2009
Date achieved compliance: 11/17/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 10/19/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Universal Waste - Small Quantity Handlers

Date violation determined: 09/24/2009
Date achieved compliance: 11/17/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 10/19/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Evaluation Action Summary:

Evaluation date: 09/24/2009

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: State Statute or Regulation

Date achieved compliance: 11/17/2009 Evaluation lead agency: State

Evaluation date: 09/24/2009

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - Pre-transport

Date achieved compliance: 11/17/2009 Evaluation lead agency: State

Evaluation date: 09/24/2009

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Universal Waste - Small Quantity Handlers

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

MICHIGAN METAL COATINGS CO (Continued)

1000392270

Date achieved compliance: 11/17/2009 Evaluation lead agency: State

Evaluation date: 09/24/2009

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Used Oil - Generators

Date achieved compliance: 11/17/2009 Evaluation lead agency: State

Evaluation date: 09/24/2009

COMPLIANCE EVALUATION INSPECTION ON-SITE Evaluation:

Area of violation: Generators - General

Date achieved compliance: 11/17/2009 Evaluation lead agency: State

E12 RCRA-SQG 1004723456 MAG IAS LLC MID985617976

NNW 2555 20TH ST

< 1/8 PORT HURON, MI 48060

0.098 mi.

517 ft. Site 1 of 2 in cluster E

RCRA-SQG: Relative:

Date form received by agency: 06/03/2013 Lower

> Facility name: MAG IAS LLC

Actual: Facility address: 2555 20TH ST 607 ft. PORT HURON, MI 48060

> EPA ID: MID985617976 Mailing address: 6015 CENTER DR

STERLING HEIGHTS, MI 48312

Contact: JAMES J KAMON

Contact address: Not reported Not reported Contact country: Not reported Contact telephone: (586) 446-7114

3024 Telephone ext.:

Contact email: JIM.KAMON@MAG-IAS.COM

EPA Region: 05 Land type: Private

Classification: Small Small Quantity Generator

Description: Handler: generates more than 100 and less than 1000 kg of hazardous

waste during any calendar month and accumulates less than 6000 kg of hazardous waste at any time; or generates 100 kg or less of hazardous waste during any calendar month, and accumulates more than 1000 kg of

hazardous waste at any time

Owner/Operator Summary:

Owner/operator name: CROSS HULLER EX CELLO LAMB

Owner/operator address: Not reported Not reported Owner/operator country: Not reported Owner/operator telephone: Not reported

Legal status: Private Owner/Operator Type: Operator Owner/Op start date: 10/05/2005 Owner/Op end date: Not reported

CROSS HULLER EX CELLO LAMB Owner/operator name:

Owner/operator address: Not reported

Direction Distance

Elevation Site Database(s) EPA ID Number

MAG IAS LLC (Continued) 1004723456

Owner/operator country: Not reported Owner/operator telephone: Not reported Legal status: Private Owner/Operator Type: Owner Owner/Op start date: 10/05/2005 Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: Nο Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Historical Generators:

Date form received by agency: 07/03/2012
Facility name: MAG IAS LLC

Classification: Small Quantity Generator

Date form received by agency: 04/18/2011
Facility name: MAG IAS LLC

Classification: Small Quantity Generator

Date form received by agency: 03/01/2011
Facility name: MAG IAS LLC

Classification: Small Quantity Generator

Date form received by agency: 12/31/2009
Facility name: MAG IAS LLC

Classification: Small Quantity Generator

Date form received by agency: 12/31/2009
Facility name: MAG IAS LLC
Site name: CROSS HULLER LLC
Classification: Small Quantity Generator

Date form received by agency: 04/03/2009
Facility name: MAG IAS LLC

Classification: Small Quantity Generator

Date form received by agency: 06/27/2008
Facility name: MAG IAS LLC

Classification: Large Quantity Generator

Date form received by agency: 03/01/2008

EDR ID Number

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

MAG IAS LLC (Continued) 1004723456

Facility name: MAG IAS LLC

Site name: CROSS HULLER EX CELLO LAMB

Classification: Large Quantity Generator

Date form received by agency: 01/01/2007 MAG IAS LLC Facility name:

Classification: Large Quantity Generator

Date form received by agency: 06/14/2006 Facility name: MAG IAS LLC

Classification: Conditionally Exempt Small Quantity Generator

Date form received by agency: 01/12/2005 Facility name: MAG IAS LLC

Classification: Small Quantity Generator

Date form received by agency: 07/02/1991 Facility name: MAG IAS LLC

Classification: Conditionally Exempt Small Quantity Generator

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Facility Has Received Notices of Violations:

Regulation violated: Not reported

Area of violation: Generators - Pre-transport

Date violation determined: 06/14/2006 01/03/2007 Date achieved compliance: Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 09/19/2006 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Final penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Records/Reporting

Date violation determined: 06/14/2006 Date achieved compliance: 01/03/2007 Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 09/19/2006 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported

Direction Distance

Elevation Site Database(s) EPA ID Number

MAG IAS LLC (Continued) 1004723456

Final penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Records/Reporting

Date violation determined: 06/14/2006
Date achieved compliance: 01/03/2007
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 06/27/2006
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Pre-transport

Date violation determined: 06/14/2006
Date achieved compliance: 01/03/2007
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 06/27/2006
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Evaluation Action Summary:

Evaluation date: 06/14/2006

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - Pre-transport

Date achieved compliance: 01/03/2007 Evaluation lead agency: State

Evaluation date: 06/14/2006

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - Records/Reporting

Date achieved compliance: 01/03/2007 Evaluation lead agency: State

E13 THE CROSS CO MI UST U003322959
NNW 2555 20TH ST N/A

< 1/8 PORT HURON, MI 48060

0.098 mi.

517 ft. Site 2 of 2 in cluster E

Relative: UST:

 Lower
 Facility ID:
 00014118

 Facility Type:
 CLOSED

 Actual:
 Owner Name:
 THE CROSS CO

607 ft. Owner Address: 17801 FOURTEEN MILE RD

Owner City, St, Zip: FRASER, MI 48026

Owner Country: USA
Owner Contact: Not reported

EDR ID Number

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

THE CROSS CO (Continued)

Horizontal Datum:

U003322959

Owner Phone: (313) 293-3000 JERRY HUMMEL Contact: Contact Phone: (313) 293-3000 Date of Collection: 01/11/2001 Accuracy: 100 Accuracy Value Unit: FEET

Source: STATE OF MICHIGAN

POINT Point Line Area:

Desc Category: Plant Entrance (Freight)

Address Matching-House Number Method of Collection:

NAD83

42.95565 Latitude: Longitude: -82.44718

Tank ID:

Tank Status: Removed from Ground

10000 Capacity: Product: HYD. OIL Install Date: 05/07/1980 Remove Date: 10/12/1993 Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Unknown Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel

Impressed Device: Nο

Tank ID: SA-02

NON-Registered Tank Tank Status:

Not reported Capacity: Product: Not reported Install Date: Not reported Remove Date: Not reported Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Not reported Piping Type: Not reported Construction Material: Not reported

Impressed Device: No

F14 **RIVERSIDE METAL PRODUCTS CO**

ESE 1631 DOVE ST

< 1/8 PORT HURON, MI 48060

0.112 mi.

593 ft. Site 1 of 2 in cluster F

UST: Relative:

Facility ID: 00007534 Lower Facility Type: CLOSED

Actual: Owner Name: RIVERSIDE INTERNATIONAL, INC.

605 ft. Owner Address: 2401 20TH ST

> Owner City, St, Zip: PORT HURON, MI 48060-6406

Owner Country: USA Owner Contact: Not reported Owner Phone: (313) 987-2470

JAMES A. VIGRASS Contact: Contact Phone: (313) 987-2470

MI UST U003321115

N/A

Direction Distance

Elevation Site Database(s) **EPA ID Number**

RIVERSIDE METAL PRODUCTS CO (Continued)

U003321115

EDR ID Number

Date of Collection: 01/11/2001 100 Accuracy: Accuracy Value Unit: FEET Horizontal Datum: NAD83

Source: STATE OF MICHIGAN

Point Line Area: **POINT**

Desc Category: Plant Entrance (Freight)

Method of Collection: Address Matching-House Number

42.95177 Latitude: Longitude: -82.44222

Tank ID:

Tank Status: **Removed from Ground**

Capacity:

Product: Hazardous Substance, BLK PNT MEK MASK WSH,

Install Date: 03/19/1976 08/01/1990 Remove Date: Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Galvanized Steel Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel, Fiberglass Reinforced plastic

Impressed Device: No

Tank ID:

Tank Status: Removed from Ground

Capacity: Product: Not reported 03/19/1976 Install Date: 08/01/1990 Remove Date: Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Galvanized Steel Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel, Fiberglass Reinforced plastic

Impressed Device:

THE CROWN GROUP RCRA NonGen / NLR 1000218192 F15 **ESE 1631 DOVE ST FINDS** MID067348193

< 1/8 PORT HURON, MI

0.112 mi.

593 ft. Site 2 of 2 in cluster F

Relative: Date form received by agency: 04/22/2009 Lower

RCRA NonGen / NLR:

THE CROWN GROUP Facility name:

Actual: Facility address: 1631 DOVE ST

605 ft. PORT HURON, MI 48060

> EPA ID: MID067348193 Contact: CARL VOGT Contact address: 1631 DOVE ST

> > PORT HURON, MI 48060

Contact country: US

Contact telephone: (586) 558-5349 Contact email: Not reported

EPA Region: 05

Land type: Other land type

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

THE CROWN GROUP (Continued)

1000218192

Classification: Non-Generator

Description: Handler: Non-Generators do not presently generate hazardous waste

Owner/Operator Summary:

Owner/operator name: NO ACTIVE O/OP AS NOT GENERATING WASTE

Owner/operator address: Not reported Not reported Owner/operator country: Not reported

Owner/operator telephone: Not reported Legal status: Private Operator Owner/Operator Type: Owner/Op start date: 03/02/2009 Owner/Op end date: Not reported

Owner/operator name: NO ACTIVE O/OP AS NOT GENERATING WASTE

Owner/operator address: Not reported

Not reported Not reported

Owner/operator telephone: Not reported Private Legal status: Owner/Operator Type: Owner Owner/Op start date: 03/02/2009 Owner/Op end date: Not reported

Handler Activities Summary:

Owner/operator country:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Historical Generators:

Date form received by agency: 03/01/2008

Facility name: THE CROWN GROUP Classification: Large Quantity Generator

Date form received by agency: 02/15/2008

THE CROWN GROUP Facility name: Classification: Large Quantity Generator

Date form received by agency: 03/31/2006

THE CROWN GROUP Facility name: Classification: Large Quantity Generator

Date form received by agency: 03/01/2006

THE CROWN GROUP Facility name:

Direction Distance

Elevation Site Database(s) EPA ID Number

THE CROWN GROUP (Continued)

1000218192

EDR ID Number

Classification: Large Quantity Generator

Date form received by agency: 01/14/2005

Facility name: THE CROWN GROUP
Classification: Large Quantity Generator

Date form received by agency: 10/25/1999

Facility name: THE CROWN GROUP

Classification: Conditionally Exempt Small Quantity Generator

Date form received by agency: 02/16/1990

Facility name: THE CROWN GROUP

Site name: RIVERSIDE METAL PRODUCTS COMPANY

Classification: Large Quantity Generator

Date form received by agency: 06/06/1983

Facility name: THE CROWN GROUP
Classification: Not a generator, verified

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Facility Has Received Notices of Violations:

Regulation violated: Not reported

Area of violation: Generators - General

Date violation determined: 09/09/2008
Date achieved compliance: 07/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 10/03/2008
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Paid penalty amount: Not reported
Not reported

Regulation violated: Not reported

Area of violation: State Statute or Regulation

Date violation determined: 09/09/2008
Date achieved compliance: 07/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 10/03/2008
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported

Direction Distance Elevation

Site Database(s) EPA ID Number

THE CROWN GROUP (Continued)

1000218192

EDR ID Number

Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Used Oil - Generators

Date violation determined: 09/09/2008
Date achieved compliance: 07/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 10/03/2008
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported
Area of violation: LDR - General
Date violation determined: 09/09/2008
Date achieved compliance: 07/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 10/03/2008
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Pre-transport

Date violation determined: 09/09/2008
Date achieved compliance: 07/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL Enforcement action date: 10/03/2008

Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State
Proposed penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Records/Reporting

Date violation determined: 09/09/2008
Date achieved compliance: 07/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 10/03/2008
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Map ID MAP FINDINGS
Direction

Distance Elevation

tion Site Database(s) EPA ID Number

THE CROWN GROUP (Continued)

1000218192

EDR ID Number

Evaluation Action Summary:

Evaluation date: 09/09/2008

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - General

Date achieved compliance: 07/21/2009 Evaluation lead agency: State

Evaluation date: 09/09/2008

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Used Oil - Generators

Date achieved compliance: 07/21/2009 Evaluation lead agency: State

Evaluation date: 09/09/2008

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: State Statute or Regulation

Date achieved compliance: 07/21/2009 Evaluation lead agency: State

Evaluation date: 09/09/2008

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: LDR - General Date achieved compliance: 07/21/2009 Evaluation lead agency: State

Evaluation date: 09/09/2008

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - Records/Reporting

Date achieved compliance: 07/21/2009 Evaluation lead agency: State

Evaluation date: 09/09/2008

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - Pre-transport

Date achieved compliance: 07/21/2009 Evaluation lead agency: State

Evaluation date: 04/07/1999

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation:

Date achieved compliance:

Evaluation lead agency:

Not reported

Not reported

State

FINDS:

Registry ID: 110009598159

Environmental Interest/Information System

US EPA TRIS (Toxics Release Inventory System) contains information from facilities on the amounts of over 300 listed toxic chemicals that these facilities release directly to air, water, land, or that are transported off-site.

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA

Direction Distance

Elevation Site Database(s) **EPA ID Number**

THE CROWN GROUP (Continued)

1000218192

EDR ID Number

program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

HAZARDOUS WASTE BIENNIAL REPORTER

SBR PRINTING USA RCRA NonGen / NLR 1007370994 16 South **1906 DOVE ST** MIK622974566

< 1/8 0.123 mi. 648 ft.

PORT HURON, MI 48060

RCRA NonGen / NLR: Relative: Lower

Date form received by agency: 08/13/2012

SBR PRINTING USA Facility name:

Actual: Facility address: 1906 DOVE ST 605 ft.

PORT HURON, MI 48060 EPA ID: MIK622974566

Contact: JAMES BROWNE Contact address: Not reported

Not reported Contact country: Not reported (810) 966-2622 Contact telephone:

Contact email: JAMESBROWNE@SBRPRINTINGUSA.NET

EPA Region: 05 Private Land type: Classification: Non-Generator

Description: Handler: Non-Generators do not presently generate hazardous waste

Owner/Operator Summary:

Owner/operator name: TERRY KRAFT Owner/operator address: Not reported

Not reported

Owner/operator country: Not reported Owner/operator telephone: Not reported Legal status: Private Owner/Operator Type: Owner Owner/Op start date: 09/01/2002 Owner/Op end date: Not reported

Owner/operator name: TERRY KRAFT Owner/operator address: Not reported Not reported

Owner/operator country: Not reported Owner/operator telephone: Not reported Legal status: Private Owner/Operator Type: Operator Owner/Op start date: 09/01/2002 Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No

Direction Distance

Elevation Site Database(s) EPA ID Number

SBR PRINTING USA (Continued)

1007370994

EDR ID Number

On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Historical Generators:

Date form received by agency: 03/19/2009

Facility name: SBR PRINTING USA
Classification: Small Quantity Generator

Date form received by agency: 03/01/2004

Facility name: SBR PRINTING USA
Classification: Small Quantity Generator

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Facility Has Received Notices of Violations:

Regulation violated: Not reported

Area of violation: State Statute or Regulation

Date violation determined: 04/09/2009
Date achieved compliance: 12/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 04/15/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported
Area of violation: LDR - General
Date violation determined: 04/09/2009
Date achieved compliance: 05/14/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 05/19/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported

Map ID MAP FINDINGS
Direction

Distance Elevation

Site Database(s) EPA ID Number

SBR PRINTING USA (Continued)

1007370994

EDR ID Number

Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Manifest

Date violation determined: 04/09/2009
Date achieved compliance: 12/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 04/15/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Paid penalty amount: Not reported
Not reported

Regulation violated: Not reported

Area of violation: Generators - Pre-transport

Date violation determined: 04/09/2009
Date achieved compliance: 12/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 05/19/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Records/Reporting

Date violation determined: 04/09/2009
Date achieved compliance: 07/29/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL Enforcement action date: 04/15/2009

Enf. disposition status:

Enf. disp. status date:

Enforcement lead agency:

Proposed penalty amount:

Final penalty amount:

Paid penalty amount:

Not reported

Not reported

Not reported

Not reported

Regulation violated:
Area of violation:

Date violation determined:
Date achieved compliance:
Violation lead agency:

Not reported
LDR - General
04/09/2009
05/14/2009
State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 04/15/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

SBR PRINTING USA (Continued)

1007370994

Regulation violated: Not reported

Generators - Pre-transport Area of violation:

Date violation determined: 04/09/2009 Date achieved compliance: 12/21/2009 Violation lead agency: State

WRITTEN INFORMAL Enforcement action:

Enforcement action date: 09/02/2009 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Not reported Final penalty amount: Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Records/Reporting

04/09/2009 Date violation determined: Date achieved compliance: 07/29/2009 Violation lead agency: State

WRITTEN INFORMAL Enforcement action:

Enforcement action date: 06/25/2009 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Not reported Final penalty amount: Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: State Statute or Regulation

04/09/2009 Date violation determined: Date achieved compliance: 12/21/2009 Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 09/02/2009 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Final penalty amount: Not reported Not reported Paid penalty amount:

Regulation violated: Not reported

Area of violation: Generators - General

Date violation determined: 04/09/2009 Date achieved compliance: 10/19/2009 Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 09/02/2009 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Final penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

SBR PRINTING USA (Continued)

1007370994

Area of violation: Generators - Pre-transport

Date violation determined: 04/09/2009 Date achieved compliance: 12/21/2009 Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 06/25/2009 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Final penalty amount: Not reported Not reported Paid penalty amount:

Regulation violated: Not reported

Area of violation: State Statute or Regulation

Date violation determined: 04/09/2009 12/21/2009 Date achieved compliance: Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 06/25/2009 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Final penalty amount: Not reported

Regulation violated: Not reported Area of violation: Generators - General

Not reported

Date violation determined: 04/09/2009 10/19/2009 Date achieved compliance: Violation lead agency: State

Paid penalty amount:

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 04/15/2009 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Final penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Records/Reporting

Date violation determined: 04/09/2009 Date achieved compliance: 07/29/2009 Violation lead agency: State

WRITTEN INFORMAL Enforcement action:

Enforcement action date: 05/19/2009 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Final penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Manifest

Direction Distance Elevation

ance EDR ID Number ation Site Database(s) EPA ID Number

SBR PRINTING USA (Continued)

1007370994

Date violation determined: 04/09/2009
Date achieved compliance: 12/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 06/25/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Pre-transport

Date violation determined: 04/09/2009
Date achieved compliance: 12/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 04/15/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State

Proposed penalty amount: Not reported Final penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Manifest

Date violation determined: 04/09/2009
Date achieved compliance: 12/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 09/02/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Paid penalty amount: Not reported
Not reported

Regulation violated: Not reported

Area of violation: State Statute or Regulation

Date violation determined: 04/09/2009
Date achieved compliance: 12/21/2009
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 05/19/2009
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State

Proposed penalty amount: Not reported

Proposed penalty amount: Not reported Final penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - General

Date violation determined: 04/09/2009

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

SBR PRINTING USA (Continued)

1007370994

Date achieved compliance: 10/19/2009 Violation lead agency: State

WRITTEN INFORMAL Enforcement action:

Enforcement action date: 05/19/2009 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Final penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Manifest

Date violation determined: 04/09/2009 Date achieved compliance: 12/21/2009 Violation lead agency: State

WRITTEN INFORMAL Enforcement action:

Enforcement action date: 05/19/2009 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State

Proposed penalty amount: Not reported Final penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - General

Date violation determined: 04/09/2009 Date achieved compliance: 10/19/2009 Violation lead agency: State

WRITTEN INFORMAL Enforcement action:

Enforcement action date: 06/25/2009 Enf. disposition status: Not reported Enf. disp. status date: Not reported Enforcement lead agency: State Proposed penalty amount: Not reported Final penalty amount: Not reported Paid penalty amount: Not reported

Evaluation Action Summary:

Evaluation date: 04/09/2009

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - General

Date achieved compliance: 10/19/2009 Evaluation lead agency: State

Evaluation date: 04/09/2009

COMPLIANCE EVALUATION INSPECTION ON-SITE Evaluation:

Area of violation: Generators - Manifest

Date achieved compliance: 12/21/2009 Evaluation lead agency: State

Evaluation date: 04/09/2009

COMPLIANCE EVALUATION INSPECTION ON-SITE Evaluation:

Area of violation: LDR - General Date achieved compliance: 05/14/2009 Evaluation lead agency: State

Direction Distance

Elevation Site Database(s) EPA ID Number

SBR PRINTING USA (Continued)

1007370994

N/A

EDR ID Number

Evaluation date: 04/09/2009

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - Pre-transport

Date achieved compliance: 12/21/2009 Evaluation lead agency: State

Evaluation date: 04/09/2009

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: State Statute or Regulation

Date achieved compliance: 12/21/2009 Evaluation lead agency: State

Evaluation date: 04/09/2009

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - Records/Reporting

Date achieved compliance: 07/29/2009 Evaluation lead agency: State

G17 SMR AUTOMOTIVE SYSTEMS USA, INC. MI BEA S113828192

East 2655 SIXTEENTH STREET

< 1/8 PORT HURON (CITY OF), MI 48060

0.123 mi.

649 ft. Site 1 of 2 in cluster G

Relative: BEA:

Lower Secondary Address: Not reported

BEA Number: 5643

Actual: District: Southeast MI 605 ft. Date Received: 07/08/2013

Submitter Name: SMR Automotive Systems USA, Inc.

Petition Determination: No Request

Petition Disclosure: 0

Category: Not reported Determination 20107A: No Request Reviewer: barrowsg Division Assigned: RRD

G18 BLACK RIVER PLASTICS RCRA NonGen / NLR 1014923937
ENE 2611 16TH ST MIK110587079

< 1/8 PORT HURON, MI 48060

C 1/6 FORT HORON, IVII

0.125 mi.

658 ft. Site 2 of 2 in cluster G

Relative: RCRA NonGen / NLR:
Lower Date form received by agency: 04/18/2011

Facility name: BLACK RIVER PLASTICS

Actual: Facility address: 2611 16TH ST

607 ft. PORT HURON, MI 48060

EPA ID: MIK110587079
Mailing address: 1855 BUSHA HWY

MARYSVILLE, MI 48040

Contact: MARK R MORROW
Contact address: Not reported

Not reported
Contact country: Not reported

Contact country: Not reported Contact telephone: (810) 364-4141

Contact email: MARK.MORROW@SMR-AUTOMOTIVE.COM

Direction Distance

Elevation Site Database(s) EPA ID Number

BLACK RIVER PLASTICS (Continued)

1014923937

EDR ID Number

EPA Region: 05

Classification: Non-Generator

Description: Handler: Non-Generators do not presently generate hazardous waste

Owner/Operator Summary:

Owner/operator name: SAMVARDHANA MOTHERSON REFLECTEC

Owner/operator address: Not reported Not reported

Owner/operator country: Not reported
Owner/operator telephone: Not reported
Legal status: Private
Owner/Operator Type: Owner
Owner/Op start date: 03/01/2011
Owner/Op end date: Not reported

Owner/operator name: SAMVARDHANA MOTHERSON REFLECTEC

Owner/operator address: Not reported

Not reported

Owner/operator country:
Owner/operator telephone:
Legal status:
Owner/Operator Type:
Owner/Op start date:
Owner/Op end date:
Not reported
Not reported
Not reported
Not reported
Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Violation Status: No violations found

Direction Distance

Elevation Site Database(s) **EPA ID Number**

19 **NJT ENTERPRISES LLC** RCRA-SQG 1000530888 SW **2100 DOVE ST US AIRS** MID985634161

1/8-1/4 0.142 mi. 752 ft.

Actual:

610 ft.

RCRA-SQG: Relative:

Higher Date form received by agency: 07/26/2013

PORT HURON, MI 48060

Facility name: COMAU INC Facility address: 2100 DOVE ST

PORT HURON, MI 48060

EPA ID: MID985634161

Mailing address: 2100 TELEGRAPH RD

SOUTHFIELD, MI 48034

Contact: **NEAL J SAIZ** Contact address: Not reported

Not reported

Contact country: Not reported (248) 000-0000 Contact telephone:

Contact email: NEAL-SAIZ@COMAU.COM

EPA Region: 05 Land type: Private

Classification: Small Small Quantity Generator

Description: Handler: generates more than 100 and less than 1000 kg of hazardous

waste during any calendar month and accumulates less than 6000 kg of hazardous waste at any time; or generates 100 kg or less of hazardous waste during any calendar month, and accumulates more than 1000 kg of

hazardous waste at any time

Owner/Operator Summary:

Owner/operator name: **CAMAU INC** Owner/operator address: Not reported

Not reported

Owner/operator country: Not reported Owner/operator telephone: Not reported Legal status: Private Owner/Operator Type: Owner Owner/Op start date: 07/01/2013 Owner/Op end date: Not reported

CAMAU INC Owner/operator name: Owner/operator address: Not reported

Not reported Not reported

Owner/operator country: Owner/operator telephone: Not reported Legal status: Private Owner/Operator Type: Operator Owner/Op start date: 07/01/2013 Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No **EDR ID Number**

Direction Distance

Elevation Site Database(s) EPA ID Number

NJT ENTERPRISES LLC (Continued)

1000530888

EDR ID Number

Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Universal Waste Summary:

Waste type: Batteries
Accumulated waste on-site: Yes
Generated waste on-site: Yes

Historical Generators:

Date form received by agency: 08/12/2009
Facility name: COMAU INC

Site name: NJT ENTERPRISES LLC
Classification: Not a generator, verified

Date form received by agency: 10/02/2007
Facility name: COMAU INC

Site name: NJT ENTERPRISES LLC Classification: Small Quantity Generator

Date form received by agency: 08/31/2007 Facility name: COMAU INC

Site name: NJT ENTERPRISES LLC Classification: Not a generator, verified

Date form received by agency: 08/12/2003
Facility name: COMAU INC

Site name: NJT ENTERPRISES LLC Classification: Small Quantity Generator

Date form received by agency: 08/13/2002
Facility name: COMAU INC

Site name: NJT ENTERPRISES LLC Classification: Small Quantity Generator

Date form received by agency: 05/13/2002 Facility name: COMAU INC

Site name: NJT ENTERPRISES LLC Classification: Small Quantity Generator

Date form received by agency: 01/29/1992 Facility name: COMAU INC

Site name: NJT ENTERPRISES LLC Classification: Small Quantity Generator

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET,

Direction Distance

Elevation Site Database(s) EPA ID Number

NJT ENTERPRISES LLC (Continued)

1000530888

EDR ID Number

WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Facility Has Received Notices of Violations:

Regulation violated: Not reported

Area of violation: Generators - General

Date violation determined: 02/19/1998
Date achieved compliance: 04/15/1998
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 03/03/1998
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Evaluation Action Summary:

Evaluation date: 08/12/2009

Evaluation: FOCUSED COMPLIANCE INSPECTION

Area of violation:
Date achieved compliance:
Evaluation lead agency:
Not reported
State

Evaluation date: 02/10/1998

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - General

Date achieved compliance: 04/15/1998 Evaluation lead agency: State

AIRS (AFS):

Compliance and Violation Data Major Sources:

EPA plant ID: 110001853389

Plant name: NJT ENTERPRISES LLC

Plant address: 2100 DOVE ST

PORT HURON, MI 48060

County: ST CLAIR
Region code: 05
Dunn & Bradst #: Not reporte

Dunn & Bradst #: Not reported
Air quality cntrl region: 123
Sic code: 3089

Sic code desc: PLASTICS PRODUCTS, NEC (1987)

North Am. industrial classf: 336399

NAIC code description: All Other Motor Vehicle Parts Manufacturing

Default compliance status: IN COMPLIANCE - INSPECTION

Default classification: POTENTIAL EMISSIONS ARE BELOW ALL APPLICABLE MAJOR SOURCE THRESHOLDS

IF AND ONLY IF THE SOURCE COMPLIES WITH FEDERALLY ENFORCEABLE

REGULATIONS OR LIMITATIONS.

Govt facility: ALL OTHER FACILITIES NOT OWNED OR OPERATED BY A FEDERAL, STATE, OR

LOCAL GOVERNMENT

Current HPV: Not reported

Direction Distance Elevation

tance EDR ID Number vation Site Database(s) EPA ID Number

NJT ENTERPRISES LLC (Continued)

1000530888

Compliance and Enforcement Major Issues:

Air program: SIP SOURCE

National action type: MULTI MEDIA INSPECTION - LEVEL 2 OR GREATER

Date achieved: 010309
Penalty amount: 000000000

Air program: SIP SOURCE

National action type: STATE CONDUCTED PCE/ ON-SITE

Date achieved: 020715
Penalty amount: Not reported

Air program: SIP SOURCE

National action type: STATE CONDUCTED FCE / ON-SITE

Date achieved: 050822
Penalty amount: Not reported

Air program: SIP SOURCE

National action type: STATE CONDUCTED FCE / ON-SITE

Date achieved: 060830
Penalty amount: Not reported

Air program: SIP SOURCE

National action type: STATE CONDUCTED FCE / ON-SITE

Date achieved: 070803
Penalty amount: Not reported

Air program: SIP SOURCE

National action type: MULTI MEDIA INSPECTION - LEVEL 2 OR GREATER

Date achieved: 970606
Penalty amount: 000000000

Historical Compliance Minor Sources:

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1004
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1103
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1202
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1301
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1101
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1004

Air prog code hist file: SIP SOURCE

Direction Distance Elevation

EDR ID Number tion Site Database(s) EPA ID Number

NJT ENTERPRISES LLC (Continued)

1000530888

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1101
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1102
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1104
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1201
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1203
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1204
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1302
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE - INSPECTION

Hist compliance date: 1303
Air prog code hist file: Not reported

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1101

Air prog code hist file: TITLE V PERMITS

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1102

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1102

Air prog code hist file: TITLE V PERMITS

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1103

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1103

Air prog code hist file: TITLE V PERMITS

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1104
Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Distance Elevation

on Site Database(s) EPA ID Number

NJT ENTERPRISES LLC (Continued)

Hist compliance date: 1104

Air prog code hist file: TITLE V PERMITS

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1201

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1201

Air prog code hist file: TITLE V PERMITS

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1202

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1202

Air prog code hist file: TITLE V PERMITS

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1203

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1203

Air prog code hist file: TITLE V PERMITS

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1204

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1204

Air prog code hist file: TITLE V PERMITS

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 130°

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1301

Air prog code hist file: TITLE V PERMITS

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1302

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1302

Air prog code hist file: TITLE V PERMITS

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1303

Air prog code hist file: SIP SOURCE

State compliance status: IN COMPLIANCE WITH PROCEDURAL REQUIREMENTS

Hist compliance date: 1303

EDR ID Number

1000530888

Direction Distance

Elevation Site Database(s) **EPA ID Number**

NJT ENTERPRISES LLC (Continued)

1000530888

U000265155

N/A

MI LUST

MI UST

MI WDS

EDR ID Number

Air prog code hist file: TITLE V PERMITS

COCA-COLA BOTTLING CO OF MI. 20

1608 DOVE ST

SE 1/8-1/4 PORT HURON, MI 48060

0.165 mi. 870 ft.

LUST: Relative:

Facility ID: 00018776 Lower

Source: STATE OF MICHIGAN

Actual: Owner Name: Coca-Cola Ent 605 ft.

9770 Patuxent Woods Dr Owner Address: Owner City, St, Zip: Columbia, MD 21046-1526

Owner Contact: Not reported Owner Phone: (410) 290-3033

Country: USA

District: SE Michigan District Office Coca Cola- Port Huron Site Name:

Latitude: 42.95205 Longitude: -82.44198 Date of Collection: 01/11/2001

Method of Collection: Address Matching-House Number

Accuracy: 100 Accuracy Value Unit: **FEET** Horizontal Data: NAD83 Point Line Area: **POINT**

Plant Entrance (Freight) Desc Category:

Leak Number: C-0199-90 Release Date: 02/02/1990 Substance Released: Not reported Release Status: Closed Release Closed Date: 05/21/1998

UST:

Facility ID: 00018776 Facility Type: CLOSED

Owner Name: **COCA-COLA ENT**

Owner Address: 9770 PATUXENT WOODS DR Owner City, St, Zip: COLUMBIA, MD 21046-1526

Owner Country: USA

Owner Contact: Not reported (410) 290-3033 Owner Phone: Contact: **KEITH WILLIAMS** Contact Phone: (313) 982-8501 Date of Collection: 01/11/2001 Accuracy: 100 Accuracy Value Unit: **FEET**

Horizontal Datum: NAD83

STATE OF MICHIGAN Source:

Point Line Area: **POINT**

Desc Category: Plant Entrance (Freight)

Method of Collection: Address Matching-House Number

Latitude: 42.95205 Longitude: -82.44198

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

COCA-COLA BOTTLING CO OF MI. (Continued)

U000265155

Tank ID:

Removed from Ground Tank Status:

Capacity: 2000 Product: Gasoline Install Date: 04/22/1971 06/17/1991 Remove Date: Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Unknown Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel, Lined Interier

Impressed Device: No

Tank ID:

Tank Status: Removed from Ground

10000 Capacity: Product: Diesel Install Date: 04/22/1971 Remove Date: 06/17/1991 Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Unknown Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel, Lined Interier

Impressed Device: Nο

WDS:

Site Id: MIG000024474 WMD Id: 451016

Site Specific Name: COCA COLA BOTTLING CO

Mailing Address: 1608 DOVE ST Mailing City/State/Zip: 48060 Mailing County: ST CLAIR

21 PENSKE TRUCK LEASING CO LP

ssw **1900 DOVE ST** 1/8-1/4 PORT HURON, MI

0.171 mi. 904 ft.

Relative:

RCRA-CESQG: Lower

Date form received by agency: 12/31/2001 Facility name: PENSKE TRUCK LEASING CO LP

Actual: 604 ft. Facility address: 1900 DOVE ST

PORT HURON, MI 48060

EPA ID: MID985642487

Mailing address: 3700 ENTERPRISE DR ALLEN PARK, MI 48101

MIKE FORBES Contact: 1900 DOVE ST Contact address:

PORT HURON, MI 48060

Contact country: US

Contact telephone: (810) 982-7042 Contact email: Not reported

EPA Region: 05 RCRA-CESQG 1000691478

FINDS

MI LUST

MI UST

MI AST MI WDS MID985642487

Direction Distance Elevation

Site Database(s) EPA ID Number

PENSKE TRUCK LEASING CO LP (Continued)

1000691478

EDR ID Number

Classification: Conditionally Exempt Small Quantity Generator

Description: Handler: generates 100 kg or less of hazardous waste per calendar

month, and accumulates 1000 kg or less of hazardous waste at any time; or generates 1 kg or less of acutely hazardous waste per calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste; or generates 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely

hazardous waste

Owner/Operator Summary:

Owner/Op end date:

Owner/operator name: PENSKE TRUCK LEASING CO

Owner/operator address: Not reported

Not reported

Owner/operator country:

Owner/operator telephone:

Legal status:

Owner/Operator Type:

Owner/Op start date:

Not reported

Not reported

Operator

Operator

Operator

Other/Op start date:

Not reported

Not reported

Not reported

Not reported

On reported

Operator

Operator

Other/Op start date:

Owner/operator name: PENSKE TRUCK LEASING CO

Owner/operator address: Not reported

Not reported

Not reported

Owner/operator country:
Owner/operator telephone:
Legal status:
Owner/Operator Type:
Owner
Owner/Op start date:
Owner/Op end date:
Not reported
Not reported
Not reported
Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: No No User oil refiner: Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Historical Generators:

Date form received by agency: 05/28/1992

Direction Distance

Elevation Site Database(s) EPA ID Number

PENSKE TRUCK LEASING CO LP (Continued)

1000691478

EDR ID Number

Facility name: PENSKE TRUCK LEASING CO LP Classification: Small Quantity Generator

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Violation Status: No violations found

FINDS:

Registry ID: 110003671321

Environmental Interest/Information System

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of

events and activities related to facilities that generate, transport,

and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA

program staff to track the notification, permit, compliance, and

corrective action activities required under RCRA.

LUST:

Facility ID: 00015566

Source: STATE OF MICHIGAN

Owner Name: Harold C Lauth & Mike P Lauth

Owner Address: 3555 Electric Ave

Owner City,St,Zip: Port Huron, MI 48060-6621

Owner Contact: Not reported
Owner Phone: (313) 987-2666

Country: USA

District: SE Michigan District Office
Site Name: Penske Truck Leasing

Latitude: 42.95194 Longitude: -82.44536 Date of Collection: 01/11/2001

Method of Collection: Address Matching-House Number

Accuracy: 100
Accuracy Value Unit: FEET
Horizontal Data: NAD83
Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Leak Number: C-0860-93
Release Date: 07/14/1993
Substance Released: Diesel
Release Status: Closed
Release Closed Date: 04/12/1995

UST:

Facility ID: 00015566

Direction Distance

Elevation Site Database(s) EPA ID Number

PENSKE TRUCK LEASING CO LP (Continued)

1000691478

EDR ID Number

Facility Type: CLOSED

Owner Name: HAROLD C LAUTH & MIKE P LAUTH

Owner Address: 3555 ELECTRIC AVE

Owner City, St, Zip: PORT HURON, MI 48060-6621

Owner Country: USA
Owner Contact: Not reported
Owner Phone: (313) 987-2666
Contact: MIKE FORBES
Contact Phone: (313) 982-7082
Date of Collection: 01/11/2001

Accuracy: 100
Accuracy Value Unit: FEET
Horizontal Datum: NAD83

Source: STATE OF MICHIGAN

Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Method of Collection: Address Matching-House Number

Latitude: 42.95194 Longitude: -82.44536

Tank ID:

Tank Status: Removed from Ground

Capacity: 12000
Product: Diesel
Install Date: 02/04/1980
Remove Date: 07/14/1993
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Galvanized Steel
Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID: 2

Tank Status: Removed from Ground

Capacity: 1000
Product: Used Oil
Install Date: 02/03/1977
Remove Date: 07/14/1993
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Galvanized Steel
Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

AST:

Facility ID: 91074186 Type: AST

Facility Phone: (313) 984-5596

Owner Name: PENSKE TRUCK LEASING

Owner Address: 1900 DOVE ST

Owner City,St,Zip: PORT HURON, MI 48060-6768

()-

Owner County: USA
Owner Contact: Not reported

Owner Telephone:

Direction Distance

Elevation Site Database(s) EPA ID Number

PENSKE TRUCK LEASING CO LP (Continued)

1000691478

EDR ID Number

District: SE Michigan District Office

Contact: ROBERT MOODY
Latitude: Not reported
Longitude: -82.446105
Date of Collection: 10/21/2003
Accuracy: 100 FEET
Horizontal Datum: NAD83

WDS:

Site Id: MID985642487 WMD Id: 407205

Site Specific Name: PENSKE TRUCK LEASING PORT HURON

Mailing Address: 3700 ENTERPRISE DR

Mailing City/State/Zip: 48101 Mailing County: WAYNE

 H22
 SMITH EARL DISTRIBUTING CO
 RCRA-CESQG
 1004723573

 SSE
 1730 DOVE ST
 FINDS
 MID985628387

1/8-1/4 PORT HURON, MI

0.182 mi.

960 ft. Site 1 of 2 in cluster H

Relative: RCRA-CESQG:

Lower Date form received by agency: 11/07/1991

Facility name: SMITH EARL DISTRIBUTING CO

Actual: Facility address: 1730 DOVE ST 605 ft. PORT HURON

PORT HURON, MI 48060

EPA ID: MID985628387

Mailing address: PO BOX 265

PORT HURON, MI 48061

Contact: RICHARD DIONNE

Contact address: 1730 DOVE ST

PORT HURON, MI 48060

Contact country: US

Contact telephone: (313) 985-9543 Contact email: Not reported

EPA Region: 05

Classification: Conditionally Exempt Small Quantity Generator

Description: Handler: generates 100 kg or less of hazardous waste per calendar

month, and accumulates 1000 kg or less of hazardous waste at any time; or generates 1 kg or less of acutely hazardous waste per calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or

other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste; or generates 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or other debris resulting from

the cleanup of a spill, into or on any land or water, of acutely

hazardous waste

Owner/Operator Summary:

Owner/operator name: SMITH ROBERT E AND LINDA

Owner/operator address: Not reported

Not reported

Distance EDR ID Number
Elevation Site EDR ID Number
Database(s) EPA ID Number

SMITH EARL DISTRIBUTING CO (Continued)

1004723573

Owner/operator country: Not reported Owner/operator telephone: Not reported Legal status: Private Owner/Operator Type: Operator Owner/Op start date: 01/01/1970 Owner/Op end date: Not reported

Owner/operator name: SMITH ROBERT E AND LINDA

Owner/operator address: Not reported

Not reported Not reported

Owner/operator country:

Owner/operator telephone:

Legal status:

Owner/Operator Type:

Owner

Owner/Op start date:

Owner/Op end date:

Not reported

Not reported

Owner

Not reported

Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: Mixed waste (haz. and radioactive): No Recycler of hazardous waste: Nο Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No Furnace exemption: Nο Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: Nο Used oil transfer facility: No Used oil transporter: No

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Violation Status: No violations found

FINDS:

Registry ID: 110003665178

Environmental Interest/Information System

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

Direction Distance

Elevation Site Database(s) EPA ID Number

H23 EARL SMITH DISTRIBUTING

SSE 1730 DOVE ST

1/8-1/4 PORT HURON, MI 48060

0.186 mi.

Actual:

980 ft. Site 2 of 2 in cluster H

Relative: LUST:

Lower Facility ID: 00016482

Source: STATE OF MICHIGAN
Owner Name: Earl Smith Distributing

605 ft. Owner Address: 1730 Dove St

Owner City, St, Zip: Port Huron, MI 48060-8006

Owner Contact: Not reported Owner Phone: (734) 985-9543

Country: USA

District: SE Michigan District Office
Site Name: Earl Smith Distributing

 Latitude:
 42.95200

 Longitude:
 -82.44339

 Date of Collection:
 01/11/2001

Method of Collection: Address Matching-House Number

Accuracy: 100
Accuracy Value Unit: FEET

Horizontal Data: NAD83
Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Leak Number:C-0729-85Release Date:06/19/1991Substance Released:Not reportedRelease Status:ClosedRelease Closed Date:11/05/1991

Leak Number: C-0730-85
Release Date: 05/30/1991
Substance Released: Not reported
Release Status: Closed
Release Closed Date: 11/05/1991

Leak Number: C-1075-91
Release Date: 05/30/1991
Substance Released: Unknown
Release Status: Open
Release Closed Date: Not reported

UST:

Facility ID: 00016482 Facility Type: CLOSED

Owner Name: EARL SMITH DISTRIBUTING

Owner Address: 1730 DOVE ST

Owner City,St,Zip: PORT HURON, MI 48060-8006

Owner Country: USA
Owner Contact: Not reported
Owner Phone: (734) 985-9543
Contact: RICHARD M. DIONNE
Contact Phone: (734) 985-9543
Date of Collection: 01/11/2001

Accuracy: 100
Accuracy Value Unit: FEET
Horizontal Datum: NAD83

EDR ID Number

U000265164

N/A

MI LUST

MI UST

MI WDS

Direction Distance

Elevation Site Database(s) EPA ID Number

EARL SMITH DISTRIBUTING (Continued)

Source: STATE OF MICHIGAN

Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Method of Collection: Address Matching-House Number

Latitude: 42.95200 Longitude: -82.44339

Tank ID:

Tank Status: Removed from Ground

Capacity: 2000
Product: Gasoline
Install Date: 04/23/1980
Remove Date: 10/10/1990
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Bare Steel
Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID: 2

Tank Status: Removed from Ground

Capacity: 2000
Product: Gasoline
Install Date: 04/23/1980
Remove Date: 10/10/1990
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Bare Steel
Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID:

Tank Status: Removed from Ground

Capacity: 2000
Product: Diesel
Install Date: 04/23/1980
Remove Date: 10/10/1990
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Bare Steel
Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

WDS:

Site Id: MID985628387 WMD Id: 406363

Site Specific Name: SMITH EARL DISTRIBUTING CO

Mailing Address: PO BOX 265
Mailing City/State/Zip: 48061
Mailing County: ST CLAIR

EDR ID Number

U000265164

Direction Distance

Elevation Site Database(s) EPA ID Number

24 EARL C. SMITH INC MI LUST U000265163
SSE 1720 DOVE ST MI UST N/A

1/8-1/4 PORT HURON, MI 48060

0.194 mi. 1024 ft.

Relative: LUST:

Lower Facility ID: 00008422

Source: STATE OF MICHIGAN

Actual: Owner Name: Magra, Inc
605 ft. Owner Address: 4815 Cabot St
Owner City,St,Zip: Detroit, MI 48210-3510

Owner Contact: Not reported
Owner Phone: (313) 984-2626

Country: USA

District: SE Michigan District Office

Site Name: Earl C. Smith Inc Latitude: 42.95201 Longitude: -82.44328 Date of Collection: 01/11/2001

Method of Collection: Address Matching-House Number

Accuracy: 100
Accuracy Value Unit: FEET
Horizontal Data: NAD83
Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Leak Number: C-2084-91
Release Date: 10/09/1991
Substance Released: Unknown
Release Status: Closed
Release Closed Date: 11/07/1995

UST:

Facility ID: 00008422
Facility Type: CLOSED
Owner Name: MAGRA, INC
Owner Address: 4815 CABOT ST

Owner City, St, Zip: DETROIT, MI 48210-3510

Owner Country: USA Owner Contact: Not reported (313) 984-2626 Owner Phone: Contact: TOM FRAZIER (313) 984-2626 Contact Phone: Date of Collection: 01/11/2001 Accuracy: 100 Accuracy Value Unit: **FEET** Horizontal Datum: NAD83

Source: STATE OF MICHIGAN

Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Method of Collection: Address Matching-House Number

Latitude: 42.95201 Longitude: -82.44328

Tank ID: 1

Tank Status: Removed from Ground

Capacity: 5000
Product: Diesel
Install Date: 04/01/1964

EDR ID Number

Direction Distance

Elevation Site Database(s) EPA ID Number

EARL C. SMITH INC (Continued)

U000265163

EDR ID Number

Remove Date: 10/16/1991
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Unknown
Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID:

Tank Status: Removed from Ground

Capacity: 6000
Product: Gasoline
Install Date: 04/01/1964
Remove Date: 10/16/1991
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Unknown
Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID:

Tank Status: Removed from Ground

Capacity: 5000
Product: Diesel
Install Date: Not reported
Remove Date: 10/16/1991
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Unknown

Piping Type: Suction: No Valve At Tank
Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID:

Tank Status: Removed from Ground

Capacity: 250
Product: Used Oil
Install Date: Not reported
Remove Date: 10/16/1991
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Unknown
Piping Type: Gravity Fed?

Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Direction Distance

EDR ID Number Elevation Site **EPA ID Number** Database(s)

125 **CHASSIS CORPORATION OF MICHIGAN** RCRA-CESQG 1000529970 FINDS MID985624592

WSW 2223 DOVE ST

1/8-1/4 PORT HURON, MI 48060

0.217 mi.

1146 ft. Site 1 of 2 in cluster I

RCRA-CESQG: Relative:

Higher Date form received by agency: 03/28/2011

CHASSIS CORPORATION OF MICHIGAN Facility name: Facility address:

Actual: 610 ft.

2223 DOVE ST PORT HURON, MI 48060

EPA ID: MID985624592 HOLLI D HUGHES Contact: Contact address: Not reported

Not reported

Contact country: Not reported Contact telephone: (810) 987-7633

Telephone ext.: 1221

Contact email: HHUGHES@SMWAUTO.COM

EPA Region: 05 Land type: Private

Conditionally Exempt Small Quantity Generator Classification:

Description: Handler: generates 100 kg or less of hazardous waste per calendar

month, and accumulates 1000 kg or less of hazardous waste at any time; or generates 1 kg or less of acutely hazardous waste per calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste; or generates 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or other debris resulting from

the cleanup of a spill, into or on any land or water, of acutely

hazardous waste

Owner/Operator Summary:

Owner/operator name: PIERRE DUBEAUCLARD

Owner/operator address: Not reported Not reported Not reported Owner/operator country: Owner/operator telephone: Not reported Legal status: Private

Owner/Operator Type: Owner Owner/Op start date: 01/02/2004 Owner/Op end date: Not reported

Owner/operator name: TKH ENTERPRISES

Owner/operator address: Not reported

Not reported

Owner/operator country: US

Owner/operator telephone: Not reported Legal status: Private Owner/Operator Type: Owner Owner/Op start date: 12/07/2000 Owner/Op end date: Not reported

PIERRE DUBEAUCLARD Owner/operator name:

Direction Distance Elevation

vation Site Database(s) EPA ID Number

CHASSIS CORPORATION OF MICHIGAN (Continued)

1000529970

EDR ID Number

Owner/operator address:

Owner/operator country:
Owner/operator telephone:
Legal status:
Owner/Operator Type:
Owner/Op start date:
Owner/Op end date:

Not reported
Not reported
Not reported
Oor reported
Oor reported
Oor reported
Oor reported
Oor reported
Not reported

Owner/operator name: TKH ENTERPRISES

Owner/operator address: Not reported

Not reported

Owner/operator country: US

Owner/operator telephone: Not reported Legal status: Private Owner/Operator Type: Operator Owner/Op start date: 12/07/2000 Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: Nο Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: No On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Historical Generators:

Date form received by agency: 03/01/2006

Facility name: CHASSIS CORPORATION OF MICHIGAN

Site name: TAKATA PETRI INC
Classification: Not a generator, verified

Date form received by agency: 03/02/2005

Facility name: CHASSIS CORPORATION OF MICHIGAN

Site name: TAKATA PETRI INC
Classification: Large Quantity Generator

Date form received by agency: 03/01/2004

Facility name: CHASSIS CORPORATION OF MICHIGAN

Site name: TAKATA PETRI INC Classification: Large Quantity Generator

Date form received by agency: 02/16/2004

Facility name: CHASSIS CORPORATION OF MICHIGAN

Site name: TAKATA PETRI INC
Classification: Large Quantity Generator

Direction Distance

Elevation Site Database(s) EPA ID Number

CHASSIS CORPORATION OF MICHIGAN (Continued)

1000529970

EDR ID Number

Date form received by agency: 03/01/2002

Facility name: CHASSIS CORPORATION OF MICHIGAN

Site name: TAKATA PETRI INC
Classification: Large Quantity Generator

Date form received by agency: 02/21/2002

Facility name: CHASSIS CORPORATION OF MICHIGAN

Site name: TAKATA PETRI INC
Classification: Large Quantity Generator

Date form received by agency: 02/28/2000

Facility name: CHASSIS CORPORATION OF MICHIGAN

Site name: PETRI INC

Classification: Large Quantity Generator

Date form received by agency: 05/18/1998

Facility name: CHASSIS CORPORATION OF MICHIGAN

Site name: PETRI INC.

Classification: Large Quantity Generator

Date form received by agency: 10/04/1991

Facility name: CHASSIS CORPORATION OF MICHIGAN

Site name: TAKATA PETRI INC
Classification: Large Quantity Generator

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Facility Has Received Notices of Violations:

Regulation violated: Not reported

Area of violation: Generators - Records/Reporting

Date violation determined: 02/21/2001
Date achieved compliance: 04/13/2001
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 02/21/2001
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State

Proposed penalty amount: Not reported Final penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: Generators - Pre-transport

Date violation determined: 02/21/2001
Date achieved compliance: 04/13/2001
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Direction Distance Elevation

evation Site Database(s) EPA ID Number

CHASSIS CORPORATION OF MICHIGAN (Continued)

1000529970

EDR ID Number

Enforcement action date: 02/21/2001
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported
Area of violation: Generators - General

Date violation determined: 03/09/1998
Date achieved compliance: 07/08/1998
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 03/09/1998
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Evaluation Action Summary:

Evaluation date: 02/21/2001

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - Pre-transport

Date achieved compliance: 04/13/2001 Evaluation lead agency: State

Evaluation date: 02/21/2001

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - Records/Reporting

Date achieved compliance: 04/13/2001 Evaluation lead agency: State

Evaluation date: 02/25/1998

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: Generators - General

Date achieved compliance: 07/08/1998 Evaluation lead agency: State

FINDS:

Registry ID: 110000404857

Environmental Interest/Information System

The NEI (National Emissions Inventory) database contains information on stationary and mobile sources that emit criteria air pollutants and their precursors, as well as hazardous air pollutants (HAPs).

US EPA TRIS (Toxics Release Inventory System) contains information from facilities on the amounts of over 300 listed toxic chemicals that these facilities release directly to air, water, land, or that are transported off-site.

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of

Direction Distance

Elevation Site **EPA ID Number** Database(s)

CHASSIS CORPORATION OF MICHIGAN (Continued)

1000529970

MI NPDES

MI BEA

MI WDS

S108414462

N/A

EDR ID Number

events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

HAZARDOUS WASTE BIENNIAL REPORTER

CRITERIA AND HAZARDOUS AIR POLLUTANT INVENTORY

ICIS (Integrated Compliance Information System) is the Integrated Compliance Information System and provides a database that, when complete, will contain integrated Enforcement and Compliance information across most of EPA's programs. The vision for ICIS is to replace EPA's independent databases that contain Enforcement data with a single repository for that information. Currently, ICIS contains all Federal Administrative and Judicial enforcement actions. This information is maintained in ICIS by EPA in the Regional offices and it Headquarters. A future release of ICIS will replace the Permit Compliance System (PCS) which supports the NPDES and will integrate that information with Federal actions already in the system. ICIS also has the capability to track other activities occurring in the Region that support Compliance and Enforcement programs. These include; Incident Tracking, Compliance Assistance, and Compliance Monitoring.

126 **AUTOMOTIVE PROPERTIES OF NEW YORK, LLC** wsw 2223 DOVE STREET

1/8-1/4 PORT HURON CITY, MI 48060 0.217 mi.

1146 ft. Site 2 of 2 in cluster I

Relative:

Higher

610 ft.

MI NPDES:

Actual:

NEC156898 Permit Number: Permitee PO Box: Permitee Email: Not reported

Issue Date: 05/25/2010 Effective Date: 05/25/2010 **Expiration Date:** 05/25/2015 Permittee Name: **Chassis Corporation**

Permittee Address: 2223 Dove Street Permittee Addr2: Not reported

Permittee City, St, Zip: Port Huron, MI 48060

Permit Type: NEC

Facility Name 2: Not reported Facility Name 3: Not reported Facility Name 4: Not reported Designed Name: Chassis Corp Latitude: 42.951667

Lat Direction: Ν Lat Type Code: LAT Longitude: -82.449444 Lon Direction: W LON Lon Type Code: Hydrologic Unit Code: Not reported

MIS410715 Permit Number:

Permitee PO Box:

Permitee Email: chhughes@smnauto.com

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

AUTOMOTIVE PROPERTIES OF NEW YORK, LLC (Continued)

S108414462

Issue Date: 09/14/2011 Effective Date: 09/14/2011 **Expiration Date:** 04/01/2014

Permittee Name: **Chassis Corporation** Permittee Address: 3221 Big Beaver Road

Permittee Addr2: Not reported Permittee City, St, Zip: Troy, MI 48084

COC Permit Type: Facility Name 2: Not reported Facility Name 3: Not reported Facility Name 4: Not reported Chassis Corp Designed Name: 42.951667 Latitude:

Lat Direction: Lat Type Code: LAT Longitude: -82.449444 Lon Direction: W Lon Type Code: LON Hydrologic Unit Code: 4090001

BEA:

Secondary Address: Not reported BEA Number: 3432 District: Southeast MI Date Received: 02/01/2007

Automotive Properties of New York, LLC Submitter Name:

Petition Determination: No Request

Petition Disclosure:

Category: Different Hazardous Substance(s)

Determination 20107A: No Request Reviewer: barrowsg

Division Assigned: Environmental Response Division

WDS:

MID985624592 Site Id: WMD Id: 406186 Site Specific Name: CMI

2223 DOVE ST Mailing Address: Mailing City/State/Zip: 48060 Mailing County: ST CLAIR

BLUE WATER AREA TRANS COMMISSION 2021 CLEVELAND AVE

SSW 1/8-1/4 PORT HURON, MI 48060 0.230 mi. 1215 ft.

LUST: Relative:

27

603 ft.

Facility ID: 00034252 Lower

Source: STATE OF MICHIGAN Actual: Owner Name: Blue Water Area Transit Owner Address: 2021 Lapeer Ave

> Owner City, St, Zip: Port Huron, MI 48060-4155

Owner Contact: Not reported Owner Phone: (810) 987-7373

Country: USA

District: SE Michigan District Office U003325328

N/A

MI LUST

MI UST

MI WDS

Direction Distance

Elevation Site Database(s) EPA ID Number

BLUE WATER AREA TRANS COMMISSION (Continued)

Site Name: Blue Water Area Trans Commission

Latitude: 42.95070
Longitude: -82.44683
Date of Collection: 10/21/2003

Method of Collection: GPS Code Meas. Standard Positioning Service SA Off

Accuracy: 100
Accuracy Value Unit: FEET
Horizontal Data: NAD83
Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Leak Number:C-0213-09Release Date:08/10/2009Substance Released:DieselRelease Status:ClosedRelease Closed Date:06/30/2011

UST:

Facility ID: 00034252 Facility Type: CLOSED

Owner Name: BLUE WATER AREA TRANSIT

Owner Address: 2021 LAPEER AVE

Owner City, St, Zip: PORT HURON, MI 48060-4155

Owner Country: USA Owner Contact: Not reported (810) 987-7373 Owner Phone: Contact: Dave Frasier (810) 987-7373 Contact Phone: Date of Collection: 10/21/2003 Accuracy: 100 Accuracy Value Unit: **FEET**

Horizontal Datum: NAD83

Source: STATE OF MICHIGAN

Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Method of Collection: GPS Code Meas. Standard Positioning Service SA Off

Latitude: 42.95070 Longitude: -82.44683

Tank ID:

Tank Status: Removed from Ground

 Capacity:
 12000

 Product:
 Diesel

 Install Date:
 06/11/1987

 Remove Date:
 07/21/2009

Tank Release Detection: Inventory Control, Manual Tank Gauging

Pipe Realease Detection: Not reported

Piping Material: Cathodically Protected
Piping Type: Suction: Valve at Tank
Construction Material: Cathodically Protected Steel

Impressed Device: No

Tank ID: 2

Tank Status: Removed from Ground

Capacity: 560
Product: Used Oil
Install Date: 12/11/1987

EDR ID Number

U003325328

Direction Distance

Elevation Site Database(s) **EPA ID Number**

BLUE WATER AREA TRANS COMMISSION (Continued)

Remove Date: 03/06/2000

Tank Release Detection: Inventory Control, Manual Tank Gauging

Pipe Realease Detection: Not reported

Cathodically Protected Piping Material: Piping Type: Suction: No Valve At Tank Construction Material: Cathodically Protected Steel

Impressed Device: No

WDS:

Site Id: MIG000023038

WMD Id: 451724

Site Specific Name: BLUE WATER AREA TRANS CO

Mailing Address: 2021 CLEVELAND AVE

Mailing City/State/Zip: 48060 Mailing County: ST CLAIR

BLUE WATER AREA TRANS COMMISSION 28

1805 CLEVELAND AVE South 1/8-1/4 PORT HURON, MI 48060

0.240 mi. 1269 ft.

UST: Relative:

Facility ID: 00008237 Lower Facility Type: CLOSED

Actual: Owner Name: **BLUE WATER AREA TRANSIT** 603 ft.

Owner Address: 2021 LAPEER AVE

Owner City,St,Zip: PORT HURON, MI 48060-4155

Owner Country: USA Owner Contact: Not reported Owner Phone: (810) 987-7373 Contact: **CHARLES LAMBERT** (313) 987-7373 Contact Phone: 01/11/2001 Date of Collection:

Accuracy: 100 Accuracy Value Unit: **FEET** Horizontal Datum: NAD83

STATE OF MICHIGAN Source:

Point Line Area: **POINT**

Plant Entrance (Freight) Desc Category:

Method of Collection: Address Matching-House Number

Latitude: 42.95005 Longitude: -82.44557

Tank ID:

Tank Status: **Removed from Ground**

Capacity: 6000 Product: Gasoline 03/31/1978 Install Date: Remove Date: 08/15/1990 Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Galvanized Steel Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel, Unknown

Impressed Device: No **EDR ID Number**

U003325328

U003321263

N/A

MI UST

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

BLUE WATER AREA TRANS COMMISSION (Continued)

U003321263

Tank ID:

Removed from Ground Tank Status:

4000 Capacity: Product: Diesel Install Date: 04/01/1983 08/15/1990 Remove Date: Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Galvanized Steel Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel, Unknown

Impressed Device:

29 **SUNRISE STORE #53** MI LUST U003330275 NW **2319 24TH STREET** MI UST N/A MI WDS PORT HURON, MI 48060

1/4-1/2 0.418 mi. 2205 ft.

LUST: Relative:

Facility ID: 00034947 Lower

Source: STATE OF MICHIGAN Actual: Owner Name: Sunrise Stores LLC 605 ft. 69245 Burke Dr Owner Address:

Owner City,St,Zip: Richmond, MI 48062-1551

Owner Contact: Not reported Owner Phone: (586) 727-3996

Country: USA

SE Michigan District Office District: Site Name: 24th Street Sunoco

Latitude: 42.95866 Longitude: -82.45291 Date of Collection: 06/13/2001

Method of Collection: GPS Code Meas. Standard Positioning Service SA Off 10

Accuracy:

Accuracy Value Unit: **METERS** Horizontal Data: NAD83 Point Line Area: **POINT**

Desc Category: Plant Entrance (Freight)

Leak Number: C-1376-92 Release Date: 08/13/1992 Substance Released: Gasoline Release Status: Closed Release Closed Date: 04/22/1999

Leak Number: C-1700-92 Release Date: 09/29/1992 Substance Released: Diesel Release Status: Closed Release Closed Date: 04/22/1999

Leak Number: C-1701-92 09/30/1992 Release Date: Substance Released: Gasoline Release Status: Closed Release Closed Date: 04/22/1999

Direction Distance

Elevation Site Database(s) EPA ID Number

SUNRISE STORE #53 (Continued)

U003330275

EDR ID Number

UST:

Facility ID: 00034947 Facility Type: ACTIVE

Owner Name: SUNRISE STORES LLC
Owner Address: 69245 BURKE DR

Owner City, St, Zip: RICHMOND, MI 48062-1551

Owner Country: USA

Owner Contact: Not reported Owner Phone: (586) 727-3996 Contact: Joe Gurzick Contact Phone: (586) 248-7139 Date of Collection: 06/13/2001 Accuracy: 10 Accuracy Value Unit: **METERS** Horizontal Datum: NAD83

Source: STATE OF MICHIGAN

Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Method of Collection: GPS Code Meas. Standard Positioning Service SA Off

Latitude: 42.95866 Longitude: -82.45291

Tank ID:

Tank Status: Removed from Ground

Capacity: 10000
Product: Gasoline
Install Date: Not reported
Remove Date: 10/05/1992

Tank Release Detection: Inventory Control, Tank Tightness Testing

Pipe Realease Detection: Line Tightness Testing
Piping Material: Galvanized Steel
Piping Type: Suction: Valve at Tank
Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID: 2

Tank Status: Removed from Ground

Capacity: 10000
Product: Gasoline
Install Date: Not reported
Remove Date: 10/05/1992

Tank Release Detection: Inventory Control, Tank Tightness Testing

Pipe Realease Detection: Line Tightness Testing
Piping Material: Galvanized Steel
Piping Type: Suction: Valve at Tank
Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID: 3

Tank Status: Removed from Ground

Capacity: 10000
Product: EMPTY
Install Date: Not reported
Remove Date: 10/05/1992
Tank Release Detection: Not reported

Direction Distance

Elevation Site Database(s) EPA ID Number

SUNRISE STORE #53 (Continued)

U003330275

EDR ID Number

Pipe Realease Detection: Not reported
Piping Material: Galvanized Steel
Piping Type: Suction: Valve at Tank
Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID:

Tank Status: Removed from Ground

Capacity: 10000 **EMPTY** Product: Not reported Install Date: 10/05/1992 Remove Date: Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Galvanized Steel Piping Type: Suction: Valve at Tank Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID: 5

Tank Status: Removed from Ground

Capacity: 5000
Product: Diesel,MPTY
Install Date: Not reported
Remove Date: 10/05/1992

Tank Release Detection: Inventory Control, Tank Tightness Testing

Pipe Realease Detection: Line Tightness Testing
Piping Material: Galvanized Steel
Piping Type: Suction: Valve at Tank
Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID:

Tank Status: Currently In Use

Capacity: 10000
Product: Gasoline
Install Date: 12/19/1992
Remove Date: Not reported

Tank Release Detection: Automatic Tank Gauging, Groundwater Monitoring, Inventory Control

Pipe Realease Detection: Automatic Line Leak Detectors, Line Tightness Testing

Piping Material: Double Walled, Fiberglass reinforced plastic

Piping Type: Pressure

Construction Material: Composite(Steel w/Fiberglass)

Impressed Device: No

Tank ID: 7

Tank Status: Currently In Use

Capacity: 10000
Product: Diesel
Install Date: 12/19/1992
Remove Date: Not reported

Tank Release Detection: Automatic Tank Gauging, Groundwater Monitoring, Inventory Control

Pipe Realease Detection: Automatic Line Leak Detectors, Line Tightness Testing

Direction Distance

Elevation Site Database(s) EPA ID Number

SUNRISE STORE #53 (Continued)

U003330275

EDR ID Number

Piping Material: Double Walled, Fiberglass reinforced plastic

Piping Type: Pressure

Construction Material: Composite(Steel w/Fiberglass)

Impressed Device: No

Tank ID:

Tank Status: Currently In Use

Capacity: 8000
Product: Gasoline
Install Date: 12/19/1992
Remove Date: Not reported

Tank Release Detection: Automatic Tank Gauging, Inventory Control

Pipe Realease Detection: Automatic Line Leak Detectors, Line Tightness Testing

Piping Material: Double Walled, Fiberglass reinforced plastic

Piping Type: Pressure

Construction Material: Composite(Steel w/Fiberglass)

Impressed Device: No

Tank ID:

Tank Status: Currently In Use

Capacity: 6000
Product: Gasoline
Install Date: 10/19/1992
Remove Date: Not reported

Tank Release Detection: Automatic Tank Gauging, Inventory Control

Pipe Realease Detection: Automatic Line Leak Detectors, Line Tightness Testing

Piping Material: Double Walled, Fiberglass reinforced plastic

Piping Type: Pressure

Construction Material: Composite(Steel w/Fiberglass)

Impressed Device: No

Tank ID: 10

Tank Status: Currently In Use

Capacity: 4000
Product: Kerosene
Install Date: 10/19/1992
Remove Date: Not reported

Tank Release Detection: Automatic Tank Gauging, Inventory Control

Pipe Realease Detection: Automatic Line Leak Detectors, Line Tightness Testing

Piping Material: Double Walled, Fiberglass reinforced plastic

Piping Type: Pressure

Construction Material: Composite(Steel w/Fiberglass)

Impressed Device: No

Tank ID: 11

Tank Status: Removed from Ground

Capacity: 6000
Product: Gasoline
Install Date: Not reported
Remove Date: 10/05/1992
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Bare Steel

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

SUNRISE STORE #53 (Continued)

U003330275

Piping Type: Suction: Valve at Tank Asphalt Coated or Bare Steel Construction Material:

Impressed Device: No

Tank ID: 12

Tank Status: Removed from Ground

Capacity: 6000 Product: Gasoline Install Date: Not reported 10/05/1992 Remove Date: Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Bare Steel

Piping Type: Suction: Valve at Tank Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID: 13

Tank Status: **Removed from Ground**

Capacity: 6000 Product: Gasoline Install Date: Not reported 10/05/1992 Remove Date: Tank Release Detection: Not reported Pipe Realease Detection: Not reported Piping Material: Bare Steel

Piping Type: Suction: Valve at Tank Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

WDS:

MID985634740 Site Id:

WMD Id: 406822

Site Specific Name: SUNOCO SERVICE STATION PORT HURON

Mailing Address: 2319 24TH ST Mailing City/State/Zip: 48060 Mailing County: ST CLAIR

30 **ALL STAR VENDING INC** MI DEL SHWS U000265253 **3443 MILITARY ST** MI LUST South N/A PORT HURON, MI 48060 MI UST

1/2-1 0.729 mi. 3848 ft.

DELETED HWS: Relative:

74000035 Facility ID: Lower

Status: Delisted - no longer meets criteria specified in rules

Actual: 594 ft.

LUST:

Facility ID: 00012738

Source: STATE OF MICHIGAN Owner Name: All Star Vending Inc Owner Address: 3443 Military St

Owner City,St,Zip: Port Huron, MI 48060-6636

Owner Contact: Not reported

Direction Distance

Elevation Site Database(s) EPA ID Number

ALL STAR VENDING INC (Continued)

Owner Phone: (734) 985-7211

Country: USA

District: SE Michigan District Office

Site Name: Allstar Services
Latitude: 42.94308
Longitude: -82.44743
Date of Collection: 01/11/2001

Method of Collection: Address Matching-House Number

Accuracy: 100
Accuracy Value Unit: FEET
Horizontal Data: NAD83
Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Leak Number:C-2296-90Release Date:11/06/1990Substance Released:Not reportedRelease Status:ClosedRelease Closed Date:12/23/1992

UST:

Facility ID: 00012738 Facility Type: CLOSED

Owner Name: ALL STAR VENDING INC
Owner Address: 3443 MILITARY ST

Owner City,St,Zip: PORT HURON, MI 48060-6636

Owner Country: USA
Owner Contact: Not reported
Owner Phone: (734) 985-7211
Contact: ANNE WILTON
Contact Phone: (734) 985-7211
Date of Collection: 01/11/2001
Accuracy: 100
Accuracy Value Unit: FEET

Accuracy Value Unit: FEET Horizontal Datum: NAD83

Source: STATE OF MICHIGAN

Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Method of Collection: Address Matching-House Number

Latitude: 42.94308 Longitude: -82.44743

Tank ID:

Tank Status: Removed from Ground

 Capacity:
 2000

 Product:
 Gasoline

 Install Date:
 04/28/1981

 Remove Date:
 06/03/1991

Tank Release Detection: Inventory Control, Manual Tank Gauging

Pipe Realease Detection: Not reported Piping Material: Bare Steel

Piping Type: Suction: Valve at Tank
Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

Tank ID: 2

Tank Status: Removed from Ground

EDR ID Number

U000265253

Direction Distance

Elevation Site Database(s) EPA ID Number

ALL STAR VENDING INC (Continued)

U000265253

EDR ID Number

Capacity: 2000
Product: Diesel
Install Date: 01/01/1976
Remove Date: 06/03/1991
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Unknown
Piping Type: Not reported

Construction Material: Asphalt Coated or Bare Steel

Impressed Device: No

31 GRAND TRUNK RAILROAD NW 2801 MINNIE STREET 1/2-1 PORT HURON, MI 48060 0.820 mi.

MI AIRS N

MI SHWS

S107697319 N/A

Relative: SHWS:

4329 ft.

Lower Facility ID: 74000002

Facility Status: Interim Response in progress

Actual: Source: Railroad Transportation 609 ft. SAM Score: 18

SAM Score Date: 12/10/2003
Township: 06N
Range: 17E
Section: 17
Quarter: NE
Quarter/Quarter: NW
Pollutants: Diesel fuel

Facility ID: 74000081

Facility Status: Inactive - no actions taken to address contamination

Source: RR Line-Haul Operating

SAM Score: 28
SAM Score Date: 03/12/2004
Township: Not reported
Range: Not reported
Section: Not reported
Quarter: Not reported
Quarter/Quarter: Not reported
Pollutants: Not reported

AIRS:

State Registration Number: B2640
Naics Code: Not reported
Contact Name: BRIAN HILL
Contact Phone: 4032941880

Contact Address: PDS RAIL CAR SERVICES CORP

Contact Address 2: 1805 30 AVENUE SE
Contact City, St, Zip: CALGARY, AL
Permit Number: 319-00
Date Received: 09/29/2000
State Registration Number: B2640
Country: Not reported

Application Reason: RAILCAR CLEANING FACILITY - FLARE

Record Type: Not reported State County FIPS: Not reported

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

GRAND TRUNK RAILROAD (Continued)

S107697319

Facility Category: Not reported SIC Primary: Not reported Tribal Code: Not reported Supplemental Location Text: Not reported Dun & Brad Street Number: Not reported **Business Name:** Not reported Principal Product: Not reported Principal Product Description: Not reported

UTM Zone (Geo Coordinates Universal Transverse Mercator System): Not reported

UTM Horizontal Coord: Not reported **UTM Vertical Coord:** Not reported Mailing Name: Not reported Mailing Contact Person: Not reported Mailing Street: Not reported Mailing City: Not reported Mailing State: Not reported Not reported Mailing Zip: Mailing Zip 4 Extension: Not reported Compliance Person: Not reported Compliance Area Code: Not reported Compliance Phone Number: Not reported **Emission Inventory Contact Person:** Not reported El Contact Area Code: Not reported El Contact Phone Number: Not reported Permit Contact Person: Not reported Permit Contact Person Area Code: Not reported Permit Contact Person Phone Number: Not reported Federal Employer Id Number: Not reported # Of Employees: Not reported Reporting Year: Not reported Date Record Was Created: Not reported

WDS:

MID094529286 Site Id:

WMD Id: 397879

GRAND TRUNK WEST R R CAR SHOP Site Specific Name:

PO BOX 208 Mailing Address: Mailing City/State/Zip: 48060 Mailing County: ST CLAIR

Site Id: MIR000023895

WMD Id: 411563

Site Specific Name: PDS RAIL CAR SERVICES CORP (USA)

Mailing Address: 2801 MINNIE ST

Mailing City/State/Zip: 48060 Mailing County: ST CLAIR

PRESTOLITE WIRE CORP PORT HURON

SSW 3529 24TH ST

1/2-1 PORT HURON, MI 48060

0.855 mi. 4514 ft.

32

Relative:

Lower

RCRA-TSDF:

Actual: Date form received by agency: 04/24/2006 599 ft.

TC3925559.2s Page 79

1000389211

MID005359294

RCRA-TSDF

CORRACTS

RAATS MI SHWS

CERC-NFRAP

RCRA-CESQG

NY MANIFEST

Map ID MAP FINDINGS
Direction

Distance

Elevation Site Database(s) EPA ID Number

PRESTOLITE WIRE CORP PORT HURON (Continued)

1000389211

EDR ID Number

Facility name: PRESTOLITE WIRE CORP

Facility address: 3529 24TH ST

PORT HURON, MI 48060

EPA ID: MID005359294
Contact: FRED KELLEY
Contact address: 3529 24TH ST

PORT HURON, MI 48060

Contact country: US

Contact telephone: (810) 987-9878 Contact email: Not reported

EPA Region: 05
Land type: Private
Classification: TSDF

Description: Handler is engaged in the treatment, storage or disposal of hazardous

waste

Classification: Conditionally Exempt Small Quantity Generator

Description: Handler: generates 100 kg or less of hazardous waste per calendar

month, and accumulates 1000 kg or less of hazardous waste at any time; or generates 1 kg or less of acutely hazardous waste per calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any

other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste; or generates 100 kg or less of any residue or contaminated soil, waste or other debris resulting from the cleanup of a spill, into or on any land or water, of acutely hazardous waste during any calendar month, and accumulates at any time: 1 kg or less of acutely hazardous waste; or 100 kg or less of any residue or contaminated soil, waste or other debris resulting from

the cleanup of a spill, into or on any land or water, of acutely

hazardous waste

Owner/Operator Summary:

Owner/operator name: PRESTOLITE WIRE CORP

Owner/operator address:

Not reported
Not reported
Owner/operator country:

Owner/operator telephone:
Legal status:
Owner/Operator Type:
Owner
Owner/Op start date:

Not reported
Not reported
Ovnered
Not reported
Ownered
Not reported
Ovnered
Not reported
Not reported
Ovnered
Not reported

Owner/Op end date: Not reported

Owner/operator name: PRESTOLITE WIRE DIV ELTRA CORP

Owner/operator address: Not reported Not reported

Owner/operator country:
Owner/operator telephone:
Legal status:
Owner/Operator Type:
Owner/Op start date:
Owner/Op end date:
Not reported
Not reported
Owner
Owner
Owner
Owner
Not reported

Owner/operator name: PRESTOLITE WIRE CORP

Owner/operator address: Not reported

Not reported

Owner/operator country: Not reported Owner/operator telephone: Not reported

Direction Distance

Elevation Site Database(s) EPA ID Number

PRESTOLITE WIRE CORP PORT HURON (Continued)

1000389211

EDR ID Number

Legal status: Private
Owner/Operator Type: Operator
Owner/Op start date: 03/15/1991
Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No Mixed waste (haz. and radioactive): No Recycler of hazardous waste: No Transporter of hazardous waste: No Treater, storer or disposer of HW: No Underground injection activity: Nο On-site burner exemption: No Furnace exemption: No Used oil fuel burner: No Used oil processor: No User oil refiner: No Used oil fuel marketer to burner: No Used oil Specification marketer: No Used oil transfer facility: No Used oil transporter: No

Historical Generators:

Date form received by agency: 03/01/2006

Facility name: PRESTOLITE WIRE CORP

Classification: Conditionally Exempt Small Quantity Generator

Date form received by agency: 04/13/2003

Facility name: PRESTOLITE WIRE CORP

Classification: Conditionally Exempt Small Quantity Generator

Date form received by agency: 10/03/2002

Facility name: PRESTOLITE WIRE CORP

Classification: Conditionally Exempt Small Quantity Generator

Date form received by agency: 09/11/2002

Facility name: PRESTOLITE WIRE CORP
Classification: Small Quantity Generator

Date form received by agency: 07/31/1995

Facility name: PRESTOLITE WIRE CORP
Classification: Small Quantity Generator

Date form received by agency: 02/28/1994

Facility name: PRESTOLITE WIRE CORP

Site name: PRESTOLITE WIRE CORPORATION

Classification: Large Quantity Generator

Date form received by agency: 02/19/1990

Facility name: PRESTOLITE WIRE CORP

Site name: PORT HURON PRESTOLITE WIRE CORP

Classification: Large Quantity Generator

Date form received by agency: 11/18/1980

Facility name: PRESTOLITE WIRE CORP
Classification: Not a generator, verified

Direction Distance

Elevation Site Database(s) EPA ID Number

PRESTOLITE WIRE CORP PORT HURON (Continued)

1000389211

EDR ID Number

Date form received by agency: 08/25/1980

Facility name: PRESTOLITE WIRE CORP

Classification: Conditionally Exempt Small Quantity Generator

Date form received by agency: 08/18/1980

Facility name: PRESTOLITE WIRE CORP
Classification: Not a generator, verified

Hazardous Waste Summary:

Waste code: D001

Waste name: IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF

LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT

WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

Corrective Action Summary:

Event date: 12/14/1991 Event: RFA Completed

Event date: 12/14/1991

Event: RFA Determination Of Need For An RFI, RFI is Necessary;

Event date: 12/31/1991

Event: CA Prioritization, Facility or area was assigned a medium corrective

action priority.

Event date: 05/01/2009

Event: RFA Determination Of Need For An RFI, RFI is Not Necessary;

Facility Has Received Notices of Violations:

Regulation violated: Not reported
Area of violation: Permits - Conditions

Date violation determined: 12/18/2001
Date achieved compliance: 03/29/2006
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 12/18/2001
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported
Area of violation: Permits - Conditions

Date violation determined: 12/18/2001
Date achieved compliance: 03/29/2006
Violation lead agency: State
Enforcement action: Not reported
Enforcement action date: 03/23/2005
Enf. disposition status: Not reported
Enf. disp. status date: Not reported

Map ID MAP FINDINGS
Direction

Distance

Elevation Site Database(s) EPA ID Number

PRESTOLITE WIRE CORP PORT HURON (Continued)

1000389211

EDR ID Number

Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported

Area of violation: TSD - Financial Requirements

Date violation determined: 03/17/1989
Date achieved compliance: 06/26/1989
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 03/22/1989
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported
Area of violation: TSD - General
Date violation determined: 03/08/1989
Date achieved compliance: 04/11/1989
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 03/14/1989
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Regulation violated: Not reported
Area of violation: LDR - General
Date violation determined: 03/08/1989
Date achieved compliance: 04/11/1989
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 03/14/1989
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Paid penalty amount: Not reported
Not reported

Regulation violated: Not reported
Area of violation: TSD - General
Date violation determined: 02/25/1988
Date achieved compliance: 09/13/1988
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 02/29/1988
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State

Map ID MAP FINDINGS

Direction Distance

Elevation Site Database(s) EPA ID Number

PRESTOLITE WIRE CORP PORT HURON (Continued)

1000389211

EDR ID Number

Proposed penalty amount: Not reported Final penalty amount: Not reported Paid penalty amount: Not reported

Regulation violated: Not reported
Area of violation: LDR - General
Date violation determined: 02/25/1988
Date achieved compliance: 09/13/1988
Violation lead agency: State

Enforcement action: WRITTEN INFORMAL

Enforcement action date: 02/29/1988
Enf. disposition status: Not reported
Enf. disp. status date: Not reported
Enforcement lead agency: State
Proposed penalty amount: Not reported
Final penalty amount: Not reported
Paid penalty amount: Not reported

Evaluation Action Summary:

Evaluation date: 12/18/2001

Evaluation: NON-FINANCIAL RECORD REVIEW

Area of violation: Permits - Conditions

Date achieved compliance: 03/29/2006 Evaluation lead agency: State

Evaluation date: 03/17/1989

Evaluation: FINANCIAL RECORD REVIEW Area of violation: TSD - Financial Requirements

Date achieved compliance: 06/26/1989 Evaluation lead agency: State

Evaluation date: 03/08/1989

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: LDR - General Date achieved compliance: 04/11/1989 Evaluation lead agency: State

Evaluation date: 03/08/1989

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: TSD - General Date achieved compliance: 04/11/1989 Evaluation lead agency: State

Evaluation date: 02/25/1988

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: TSD - General Date achieved compliance: 09/13/1988 Evaluation lead agency: State

Evaluation date: 02/25/1988

Evaluation: COMPLIANCE EVALUATION INSPECTION ON-SITE

Area of violation: LDR - General Date achieved compliance: 09/13/1988 Evaluation lead agency: State

CERC-NFRAP:

Site ID: 0502281

MAP FINDINGS Map ID

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

PRESTOLITE WIRE CORP PORT HURON (Continued)

1000389211

Federal Facility: Not a Federal Facility NPL Status: Not on the NPL

Non NPL Status: NFRAP-Site does not qualify for the NPL based on existing information

Program Priority:

Description: **Great Lakes**

CERCLIS-NFRAP Assessment History:

Action: PRELIMINARY ASSESSMENT

Date Started: 11 Date Completed: 01/05/90

NFRAP-Site does not qualify for the NPL based on existing information Priority Level:

Action: ARCHIVE SITE

Date Started: Date Completed: 01/05/90 Priority Level: Not reported

PRELIMINARY ASSESSMENT Action:

Date Started:

Date Completed: 10/05/88

Priority Level: Low priority for further assessment

DISCOVERY Action: Date Started: 11 Date Completed: 02/12/87 Priority Level: Not reported

CORRACTS:

EPA ID: MID005359294

EPA Region:

ENTIRE FACILITY Area Name:

Actual Date: 20090501

CA070NO - RFA Determination Of Need For An RFI, RFI is Not Necessary Action:

NAICS Code(s): 33122 54171

Rolling and Drawing of Purchased Steel

Research and Development in the Physical, Engineering, and Life

Sciences

Original schedule date: Not reported Schedule end date: Not reported

EPA ID: MID005359294

EPA Region: 05

Area Name: **ENTIRE FACILITY**

Actual Date: 19911214

Action: CA070YE - RFA Determination Of Need For An RFI, RFI is Necessary

NAICS Code(s): 33122 54171

Rolling and Drawing of Purchased Steel

Research and Development in the Physical, Engineering, and Life

Sciences

Original schedule date: Not reported Schedule end date: Not reported

EPA ID: MID005359294 Map ID MAP FINDINGS

Direction Distance

Elevation Site Database(s) EPA ID Number

PRESTOLITE WIRE CORP PORT HURON (Continued)

1000389211

EDR ID Number

EPA Region: 05

Area Name: ENTIRE FACILITY

Actual Date: 19911214

Action: CA050 - RFA Completed

NAICS Code(s): 33122 54171

Rolling and Drawing of Purchased Steel

Research and Development in the Physical, Engineering, and Life

Sciences

Original schedule date: Not reported Schedule end date: Not reported

EPA ID: MID005359294

EPA Region: 05

Area Name: ENTIRE FACILITY

Actual Date: 19911231

Action: CA075ME - CA Prioritization, Facility or area was assigned a medium

corrective action priority

NAICS Code(s): 33122 54171

Rolling and Drawing of Purchased Steel

Research and Development in the Physical, Engineering, and Life

Sciences

Original schedule date: Not reported Schedule end date: Not reported

SHWS:

Facility ID: 74000015

Facility Status: Interim Response in progress

Source: Not reported

SAM Score: 18

SAM Score Date: 10/23/1991
Township: 06N
Range: 17E
Section: 21
Quarter: SW
Quarter/Quarter: NE
Pollutants: Heavy mfg

NY MANIFEST:

EPA ID: MID005359294

Country: USA

Mailing Name: BENDIX WIRE DIV.-ALLIED AUTO PRESTOLITE Mailing Contact: BENDIX WIRE DIV.-ALLIED AUTO PRESTOLITE

Mailing Address: 3529 24TH STREET
Mailing Address 2: Not reported
Mailing City: PORT HURON

Mailing State: MI
Mailing Zip: 48060
Mailing Zip4: Not reported
Mailing Country: USA
Mailing Phone: 313-987-6300

Document ID: NYA4206701
Manifest Status: Completed copy

Trans1 State ID: 9A098
Trans2 State ID: K62799NY

MAP FINDINGS Map ID

Direction Distance

EDR ID Number Elevation Site Database(s) **EPA ID Number**

PRESTOLITE WIRE CORP PORT HURON (Continued)

1000389211

Generator Ship Date: 860828 860828 Trans1 Recv Date: Trans2 Recv Date: Not reported TSD Site Recv Date: 860829 Part A Recv Date: 860904 Part B Recv Date: 860904 Generator EPA ID: MID005359294 Trans1 EPA ID: NYD051809952 Trans2 EPA ID: Not reported TSDF ID: NYD049836679

B006 - PCB TRANSFORMERS WITH 500 PPM OR > PCB Waste Code:

39400 Quantity: P - Pounds Units: Number of Containers: 003

Container Type: DT - Dump trucks Handling Method: L Landfill.

Specific Gravity: 100 Year: 86

Document ID: NYB5312844

Manifest Status: Completed after the designated time period for a TSDF to get a copy to the DEC

Trans1 State ID: IL515367S Trans2 State ID: Not reported 930728 Generator Ship Date: Trans1 Recv Date: 930728 Trans2 Recy Date: Not reported TSD Site Recv Date: 930810 Part A Recv Date: 930805 Part B Recv Date: 930824 MID005359294 Generator EPA ID: Trans1 EPA ID: ILD099202681 Trans2 EPA ID: Not reported

TSDF ID: NYD049836679 U225 - BROMOFORM Waste Code: 00005

G - Gallons (liquids only)* (8.3 pounds) Units:

Number of Containers: 001

Container Type: DF - Fiberboard or plastic drums (glass) Handling Method: T Chemical, physical, or biological treatment.

Specific Gravity: 100 Year: 93

GIBRALTAR SPROCKET CO 33 SSW 3592 MILITARY ST 1/2-1 PORT HURON, MI 48060

Quantity:

0.913 mi. 4823 ft.

SHWS: Relative:

Facility ID: 74000154 Lower

Facility Status: Interim Response in progress Actual: **Fabricated Metal Products** Source:

597 ft. SAM Score: 15

> SAM Score Date: 12/09/2003 06N Township: 17E Range: Section: 21

U000265263

N/A

MI SHWS

MI LUST

MI UST

MI WDS

Map ID MAP FINDINGS

Direction Distance

Elevation Site Database(s) EPA ID Number

GIBRALTAR SPROCKET CO (Continued)

U000265263

EDR ID Number

Quarter: SE Quarter/Quarter: SW

Pollutants: Pb; Zn; Metals; PNAs

LUST:

Facility ID: 00020311

Source: STATE OF MICHIGAN Owner Name: Gibraltar Sprocket Co

Owner Address: 3529 24th St

Owner City, St, Zip: Port Huron, MI 48060-6879

Owner Contact: Not reported
Owner Phone: (810) 985-9511

Country: USA

District: SE Michigan District Office

Site Name: Gibraltar Sprocket

 Latitude:
 42.94012

 Longitude:
 -82.45048

 Date of Collection:
 01/11/2001

Method of Collection: Address Matching-House Number

Accuracy: 100
Accuracy Value Unit: FEET
Horizontal Data: NAD83
Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Leak Number: C-1661-94
Release Date: 12/29/1994
Substance Released: Gasoline
Release Status: Open
Release Closed Date: Not reported

UST:

Facility ID: 00020311
Facility Type: CLOSED

Owner Name: GIBRALTAR SPROCKET CO

Owner Address: 3529 24TH ST

Owner City,St,Zip: PORT HURON, MI 48060-6879

Owner Country: USA
Owner Contact: Not reported
Owner Phone: (810) 985-9511
Contact: MR ALLAN ECKHARDT

Contact Phone: (810) 985-9511

Date of Collection: 01/11/2001
Accuracy: 100
Accuracy Value Unit: FEET
Horizontal Datum: NAD83

Source: STATE OF MICHIGAN

Point Line Area: POINT

Desc Category: Plant Entrance (Freight)

Method of Collection: Address Matching-House Number

Latitude: 42.94012 Longitude: -82.45048

Tank ID:

Tank Status: Removed from Ground

Capacity: 3000 Product: Gasoline Map ID MAP FINDINGS

Direction Distance

Elevation Site Database(s) EPA ID Number

GIBRALTAR SPROCKET CO (Continued)

U000265263

S108959542

N/A

MI SHWS

MI WDS

EDR ID Number

Install Date: 08/21/1968
Remove Date: 01/09/1995
Tank Release Detection: Not reported
Pipe Realease Detection: Not reported
Piping Material: Galvanized Steel
Piping Type: Not reported

Construction Material: Fiberglass Reinforced plastic, Lined Interier

Impressed Device: No

WDS:

Site Id: MIG000001823

WMD Id: 458944

Site Specific Name: GIBRALTAR SPROCKET

Mailing Address: 3592 MILITARY RD

Mailing City/State/Zip: 48060
Mailing County: ST CLAIR

34 ANCHOR RECYCLING SW 2829 GOULDEN STREET 1/2-1 PORT HURON, MI 48060

0.915 mi. 4833 ft.

Relative: SHWS:

Higher Facility ID: 74000182

Facility Status: Remedial Action In progress

Actual: Source: Refuse Systems

610 ft. SAM Score: 26

SAM Score Date: 01/07/2004
Township: Not reported
Range: Not reported
Section: Not reported
Quarter: Not reported
Quarter/Quarter: Not reported
Pollutants: Not reported

WDS:

Site Id: MID982066268 WMD Id: 400714

Site Specific Name: MICHIGAN NATIONAL BANK

Mailing Address: 124 W ALLEGAN ST

Mailing City/State/Zip: 48901 Mailing County: INGHAM

Site Id: Not reported WMD Id: 485732

Site Specific Name: MID-MICHIGAN RECYCLING

Mailing Address: 2829 GOULDEN ST

Mailing City/State/Zip: 48060
Mailing County: ST CLAIR

Count: 0 records. ORPHAN SUMMARY

City EDR ID Site Name Site Address Zip Database(s)

NO SITES FOUND

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Number of Days to Update: Provides confirmation that EDR is reporting records that have been updated within 90 days from the date the government agency made the information available to the public.

STANDARD ENVIRONMENTAL RECORDS

Federal NPL site list

NPL: National Priority List

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 10/25/2013 Source: EPA
Date Data Arrived at EDR: 11/11/2013 Telephone: N/A

Date Made Active in Reports: 01/28/2014 Last EDR Contact: 04/08/2014

Number of Days to Update: 78 Next Scheduled EDR Contact: 07/21/2014
Data Release Frequency: Quarterly

NPL Site Boundaries

Sources

EPA's Environmental Photographic Interpretation Center (EPIC)

Telephone: 202-564-7333

EPA Region 1 EPA Region 6

Telephone 617-918-1143 Telephone: 214-655-6659

EPA Region 3 EPA Region 7

Telephone 215-814-5418 Telephone: 913-551-7247

EPA Region 4 EPA Region 8

Telephone 404-562-8033 Telephone: 303-312-6774

EPA Region 5 EPA Region 9

Telephone 312-886-6686 Telephone: 415-947-4246

EPA Region 10

Telephone 206-553-8665

Proposed NPL: Proposed National Priority List Sites

A site that has been proposed for listing on the National Priorities List through the issuance of a proposed rule in the Federal Register. EPA then accepts public comments on the site, responds to the comments, and places on the NPL those sites that continue to meet the requirements for listing.

Date of Government Version: 10/25/2013 Source: EPA
Date Data Arrived at EDR: 11/11/2013 Telephone: N/A

Number of Days to Update: 78 Next Scheduled EDR Contact: 07/21/2014
Data Release Frequency: Quarterly

NPL LIENS: Federal Superfund Liens

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/1991 Date Data Arrived at EDR: 02/02/1994 Date Made Active in Reports: 03/30/1994

Number of Days to Update: 56

Source: EPA Telephone: 202-564-4267 Last EDR Contact: 08/15/2011

Next Scheduled EDR Contact: 11/28/2011 Data Release Frequency: No Update Planned

Federal Delisted NPL site list

DELISTED NPL: National Priority List Deletions

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 10/25/2013 Date Data Arrived at EDR: 11/11/2013 Date Made Active in Reports: 01/28/2014

Number of Days to Update: 78

Source: EPA Telephone: N/A

Last EDR Contact: 04/08/2014 Next Scheduled EDR Contact: 07/21/2014

Next Scheduled EDR Contact: 07/21/20 Data Release Frequency: Quarterly

Federal CERCLIS list

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 10/25/2013 Date Data Arrived at EDR: 11/11/2013 Date Made Active in Reports: 02/13/2014

Number of Days to Update: 94

Source: EPA

Telephone: 703-412-9810 Last EDR Contact: 02/28/2014

Next Scheduled EDR Contact: 06/09/2014 Data Release Frequency: Quarterly

FEDERAL FACILITY: Federal Facility Site Information listing

A listing of National Priority List (NPL) and Base Realignment and Closure (BRAC) sites found in the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Database where EPA Federal Facilities Restoration and Reuse Office is involved in cleanup activities.

Date of Government Version: 05/31/2013 Date Data Arrived at EDR: 07/08/2013 Date Made Active in Reports: 12/06/2013

Number of Days to Update: 151

Source: Environmental Protection Agency

Telephone: 703-603-8704 Last EDR Contact: 04/11/2014

Next Scheduled EDR Contact: 07/21/2014 Data Release Frequency: Varies

Federal CERCLIS NFRAP site List

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

Date of Government Version: 10/25/2013 Date Data Arrived at EDR: 11/11/2013 Date Made Active in Reports: 02/13/2014

Number of Days to Update: 94

Source: EPA

Telephone: 703-412-9810 Last EDR Contact: 02/28/2014

Next Scheduled EDR Contact: 06/09/2014
Data Release Frequency: Quarterly

Federal RCRA CORRACTS facilities list

CORRACTS: Corrective Action Report

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 03/11/2014 Date Data Arrived at EDR: 03/13/2014 Date Made Active in Reports: 04/09/2014

Number of Days to Update: 27

Source: EPA

Telephone: 800-424-9346 Last EDR Contact: 03/13/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Quarterly

Federal RCRA non-CORRACTS TSD facilities list

RCRA-TSDF: RCRA - Treatment, Storage and Disposal

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 03/11/2014 Date Data Arrived at EDR: 03/13/2014 Date Made Active in Reports: 04/09/2014

Number of Days to Update: 27

Source: Environmental Protection Agency

Telephone: 312-886-6186 Last EDR Contact: 03/13/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Quarterly

Federal RCRA generators list

RCRA-LQG: RCRA - Large Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

Date of Government Version: 03/11/2014 Date Data Arrived at EDR: 03/13/2014 Date Made Active in Reports: 04/09/2014

Number of Days to Update: 27

Source: Environmental Protection Agency

Telephone: 312-886-6186 Last EDR Contact: 03/13/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Quarterly

RCRA-SQG: RCRA - Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

Date of Government Version: 03/11/2014 Date Data Arrived at EDR: 03/13/2014 Date Made Active in Reports: 04/09/2014

Number of Days to Update: 27

Source: Environmental Protection Agency

Telephone: 312-886-6186 Last EDR Contact: 03/13/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Quarterly

RCRA-CESQG: RCRA - Conditionally Exempt Small Quantity Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

Date of Government Version: 03/11/2014 Date Data Arrived at EDR: 03/13/2014 Date Made Active in Reports: 04/09/2014

Number of Days to Update: 27

Source: Environmental Protection Agency

Telephone: 312-886-6186 Last EDR Contact: 03/13/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Varies

Federal institutional controls / engineering controls registries

US ENG CONTROLS: Engineering Controls Sites List

A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Date of Government Version: 12/17/2013 Date Data Arrived at EDR: 01/14/2014 Date Made Active in Reports: 01/28/2014

Number of Days to Update: 14

Source: Environmental Protection Agency

Telephone: 703-603-0695 Last EDR Contact: 03/10/2014

Next Scheduled EDR Contact: 06/23/2014 Data Release Frequency: Varies

US INST CONTROL: Sites with Institutional Controls

A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Date of Government Version: 12/17/2013 Date Data Arrived at EDR: 01/14/2014 Date Made Active in Reports: 01/28/2014

Number of Days to Update: 14

Source: Environmental Protection Agency

Telephone: 703-603-0695 Last EDR Contact: 03/10/2014

Next Scheduled EDR Contact: 06/23/2014 Data Release Frequency: Varies

LUCIS: Land Use Control Information System

LUCIS contains records of land use control information pertaining to the former Navy Base Realignment and Closure properties.

Date of Government Version: 02/26/2014 Date Data Arrived at EDR: 02/28/2014 Date Made Active in Reports: 04/24/2014

Number of Days to Update: 55

Source: Department of the Navy Telephone: 843-820-7326 Last EDR Contact: 02/14/2014

Next Scheduled EDR Contact: 06/02/2014 Data Release Frequency: Varies

Federal ERNS list

ERNS: Emergency Response Notification System

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 09/30/2013 Date Data Arrived at EDR: 10/01/2013 Date Made Active in Reports: 12/06/2013

Number of Days to Update: 66

Source: National Response Center, United States Coast Guard

Telephone: 202-267-2180 Last EDR Contact: 04/04/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Annually

State- and tribal - equivalent CERCLIS

SHWS: Contaminated Sites

State Hazardous Waste Sites. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. Available information varies by state.

Date of Government Version: 10/01/2013 Date Data Arrived at EDR: 10/31/2013 Date Made Active in Reports: 11/20/2013

Number of Days to Update: 20

Source: Dept of Environmental Quality

Telephone: 517-373-9541 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014
Data Release Frequency: No Update Planned

State and tribal landfill and/or solid waste disposal site lists

SWF/LF: Solid Waste Facilities Database

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites

Date of Government Version: 03/31/2014 Date Data Arrived at EDR: 04/01/2014 Date Made Active in Reports: 05/05/2014

Number of Days to Update: 34

Source: Dept of Environmental Quality

Telephone: 517-335-4035 Last EDR Contact: 04/01/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Semi-Annually

State and tribal leaking storage tank lists

LUST: Leaking Underground Storage Tank Sites

Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 02/01/2014 Date Data Arrived at EDR: 02/19/2014 Date Made Active in Reports: 03/26/2014

Number of Days to Update: 35

Source: Dept of Environmental Quality

Telephone: 517-373-9837 Last EDR Contact: 02/19/2014

Next Scheduled EDR Contact: 06/02/2014 Data Release Frequency: Annually

INDIAN LUST R1: Leaking Underground Storage Tanks on Indian Land A listing of leaking underground storage tank locations on Indian Land.

Date of Government Version: 02/01/2013
Date Data Arrived at EDR: 05/01/2013
Date Made Active in Reports: 11/01/2013

Number of Days to Update: 184

Source: EPA Region 1 Telephone: 617-918-1313 Last EDR Contact: 05/02/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Varies

INDIAN LUST R8: Leaking Underground Storage Tanks on Indian Land

LUSTs on Indian land in Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming.

Date of Government Version: 08/27/2012 Date Data Arrived at EDR: 08/28/2012 Date Made Active in Reports: 10/16/2012

Number of Days to Update: 49

Source: EPA Region 8 Telephone: 303-312-6271 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Quarterly

INDIAN LUST R4: Leaking Underground Storage Tanks on Indian Land LUSTs on Indian land in Florida, Mississippi and North Carolina.

Date of Government Version: 11/21/2013 Date Data Arrived at EDR: 11/26/2013 Date Made Active in Reports: 02/24/2014

Number of Days to Update: 90

Source: EPA Region 4 Telephone: 404-562-8677 Last EDR Contact: 04/22/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Semi-Annually

INDIAN LUST R6: Leaking Underground Storage Tanks on Indian Land LUSTs on Indian land in New Mexico and Oklahoma.

Date of Government Version: 09/12/2011 Date Data Arrived at EDR: 09/13/2011 Date Made Active in Reports: 11/11/2011

Number of Days to Update: 59

Source: EPA Region 6 Telephone: 214-665-6597 Last EDR Contact: 02/21/2014

Next Scheduled EDR Contact: 05/12/2014 Data Release Frequency: Varies

INDIAN LUST R7: Leaking Underground Storage Tanks on Indian Land LUSTs on Indian land in Iowa, Kansas, and Nebraska

Date of Government Version: 02/20/2014 Date Data Arrived at EDR: 02/21/2014 Date Made Active in Reports: 04/24/2014

Number of Days to Update: 62

Source: EPA Region 7 Telephone: 913-551-7003 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Varies

INDIAN LUST R9: Leaking Underground Storage Tanks on Indian Land LUSTs on Indian land in Arizona, California, New Mexico and Nevada

Date of Government Version: 03/01/2013 Date Data Arrived at EDR: 03/01/2013 Date Made Active in Reports: 04/12/2013

Number of Days to Update: 42

Source: Environmental Protection Agency

Telephone: 415-972-3372 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Quarterly

INDIAN LUST R10: Leaking Underground Storage Tanks on Indian Land LUSTs on Indian land in Alaska, Idaho, Oregon and Washington.

Date of Government Version: 11/06/2013 Date Data Arrived at EDR: 11/07/2013 Date Made Active in Reports: 12/06/2013

Number of Days to Update: 29

Source: EPA Region 10 Telephone: 206-553-2857 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Quarterly

INDIAN LUST R5: Leaking Underground Storage Tanks on Indian Land

Leaking underground storage tanks located on Indian Land in Michigan, Minnesota and Wisconsin.

Date of Government Version: 02/13/2014 Date Data Arrived at EDR: 02/14/2014 Date Made Active in Reports: 02/24/2014

Number of Days to Update: 10

Source: EPA, Region 5 Telephone: 312-886-7439 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Varies

State and tribal registered storage tank lists

UST: Underground Storage Tank Facility List

Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 02/01/2014
Date Data Arrived at EDR: 02/19/2014
Date Made Active in Reports: 03/26/2014

Number of Days to Update: 35

Source: Dept of Environmental Quality

Telephone: 517-335-4035 Last EDR Contact: 02/19/2014

Next Scheduled EDR Contact: 06/02/2014 Data Release Frequency: Annually

UST 2: Underground Storage Tank Listing

A listing of underground storage tank site locations that have unknown owner information.

Date of Government Version: 02/27/2014 Date Data Arrived at EDR: 02/28/2014 Date Made Active in Reports: 03/27/2014

Number of Days to Update: 27

Source: Dept of Environmental Quality Telephone: 517-335-7211

Last EDR Contact: 04/21/2014

Next Scheduled EDR Contact: 08/04/2014 Data Release Frequency: Annually

AST: Aboveground Tanks

Registered Aboveground Storage Tanks.

Date of Government Version: 02/14/2014 Date Data Arrived at EDR: 02/18/2014 Date Made Active in Reports: 03/28/2014

Number of Days to Update: 38

Source: Dept of Environmental Quality Telephone: 517-373-8168 Last EDR Contact: 02/14/2014

Next Scheduled EDR Contact: 06/02/2014 Data Release Frequency: No Update Planned

INDIAN UST R1: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 1 (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont and ten Tribal Nations).

Date of Government Version: 02/01/2013 Date Data Arrived at EDR: 05/01/2013 Date Made Active in Reports: 01/27/2014

Number of Days to Update: 271

Source: EPA, Region 1 Telephone: 617-918-1313 Last EDR Contact: 05/02/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Varies

INDIAN UST R4: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 4 (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee and Tribal Nations)

Date of Government Version: 11/21/2013 Date Data Arrived at EDR: 11/26/2013 Date Made Active in Reports: 02/24/2014

Number of Days to Update: 90

Source: EPA Region 4 Telephone: 404-562-9424 Last EDR Contact: 04/22/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Semi-Annually

INDIAN UST R5: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 5 (Michigan, Minnesota and Wisconsin and Tribal Nations).

Date of Government Version: 02/13/2014 Date Data Arrived at EDR: 02/14/2014 Date Made Active in Reports: 02/24/2014

Number of Days to Update: 10

Source: EPA Region 5 Telephone: 312-886-6136 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Varies

INDIAN UST R7: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 7 (Iowa, Kansas, Missouri, Nebraska, and 9 Tribal Nations).

Date of Government Version: 02/20/2014 Date Data Arrived at EDR: 02/21/2014 Date Made Active in Reports: 04/24/2014

Number of Days to Update: 62

Source: EPA Region 7 Telephone: 913-551-7003 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Varies

INDIAN UST R8: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 8 (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming and 27 Tribal Nations).

Date of Government Version: 07/29/2013 Date Data Arrived at EDR: 08/01/2013 Date Made Active in Reports: 11/01/2013

Number of Days to Update: 92

Source: EPA Region 8 Telephone: 303-312-6137 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Quarterly

INDIAN UST R9: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 9 (Arizona, California, Hawaii, Nevada, the Pacific Islands, and Tribal Nations).

Date of Government Version: 07/29/2013 Date Data Arrived at EDR: 07/30/2013 Date Made Active in Reports: 12/06/2013

Number of Days to Update: 129

Source: EPA Region 9 Telephone: 415-972-3368 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Quarterly

INDIAN UST R10: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 10 (Alaska, Idaho, Oregon, Washington, and Tribal Nations).

Date of Government Version: 02/05/2013 Date Data Arrived at EDR: 02/06/2013 Date Made Active in Reports: 04/12/2013

Number of Days to Update: 65

Source: EPA Region 10 Telephone: 206-553-2857 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Quarterly

INDIAN UST R6: Underground Storage Tanks on Indian Land

The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 6 (Louisiana, Arkansas, Oklahoma, New Mexico, Texas and 65 Tribes).

Date of Government Version: 01/29/2014 Date Data Arrived at EDR: 01/29/2014 Date Made Active in Reports: 03/12/2014

Number of Days to Update: 42

Source: EPA Region 6 Telephone: 214-665-7591 Last EDR Contact: 01/27/2014

Next Scheduled EDR Contact: 05/12/2014 Data Release Frequency: Semi-Annually

FEMA UST: Underground Storage Tank Listing

A listing of all FEMA owned underground storage tanks.

Date of Government Version: 01/01/2010 Date Data Arrived at EDR: 02/16/2010 Date Made Active in Reports: 04/12/2010

Number of Days to Update: 55

Source: FEMA

Telephone: 202-646-5797 Last EDR Contact: 04/15/2014

Next Scheduled EDR Contact: 07/28/2014 Data Release Frequency: Varies

State and tribal institutional control / engineering control registries

AUL: Engineering and Institutional Controls

A listing of sites with institutional and/or engineering controls in place.

Date of Government Version: 03/04/2014 Date Data Arrived at EDR: 03/06/2014 Date Made Active in Reports: 03/27/2014

Number of Days to Update: 21

Source: Dept of Environmental Quality

Telephone: 517-373-4828 Last EDR Contact: 03/03/2014

Next Scheduled EDR Contact: 06/06/2014 Data Release Frequency: Varies

State and tribal voluntary cleanup sites

INDIAN VCP R1: Voluntary Cleanup Priority Listing

A listing of voluntary cleanup priority sites located on Indian Land located in Region 1.

Date of Government Version: 09/17/2013 Date Data Arrived at EDR: 10/01/2013 Date Made Active in Reports: 12/06/2013

Number of Days to Update: 66

Source: EPA, Region 1 Telephone: 617-918-1102 Last EDR Contact: 04/01/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Varies

INDIAN VCP R7: Voluntary Cleanup Priority Lisitng

A listing of voluntary cleanup priority sites located on Indian Land located in Region 7.

Date of Government Version: 03/20/2008 Date Data Arrived at EDR: 04/22/2008 Date Made Active in Reports: 05/19/2008

Number of Days to Update: 27

Source: EPA, Region 7 Telephone: 913-551-7365 Last EDR Contact: 04/20/2009

Next Scheduled EDR Contact: 07/20/2009 Data Release Frequency: Varies

State and tribal Brownfields sites

BROWNFIELDS: Brownfields and USTfield Site Database

All state funded Part 201 and 213 sites, as well as LUST sites that have been redeveloped by private entities using the BEA process. Be aware that this is not a list of all of the potential brownfield sites in Michigan.

Date of Government Version: 07/27/2012 Date Data Arrived at EDR: 07/31/2012 Date Made Active in Reports: 09/20/2012

Number of Days to Update: 51

Source: Dept of Environmental Quality Telephone: 517-373-4805 Last EDR Contact: 04/28/2014 Next Scheduled EDR Contact: 08/11/2014

Data Release Frequency: Varies

BROWNFIELDS 2: Brownfields Building and Land Site Locations

A listing of brownfield building and land site locations. The listing is a collaborative effort of Michigan Economic Development Corporation, Michigan Economic Developers Association, Detrot Edison, Detroit Area Commercial Board of Realtors

Date of Government Version: 04/09/2007 Date Data Arrived at EDR: 04/10/2007 Date Made Active in Reports: 05/01/2007

Number of Days to Update: 21

Source: Economic Development Corporation Telephone: 888-522-0103

Last EDR Contact: 03/03/2014

Next Scheduled EDR Contact: 06/16/2014

Data Release Frequency: Varies

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS: A Listing of Brownfields Sites

Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. Assessment, Cleanup and Redevelopment Exchange System (ACRES) stores information reported by EPA Brownfields grant recipients on brownfields properties assessed or cleaned up with grant funding as well as information on Targeted Brownfields Assessments performed by EPA Regions. A listing of ACRES Brownfield sites is obtained from Cleanups in My Community. Cleanups in My Community provides information on Brownfields properties for which information is reported back to EPA, as well as areas served by Brownfields grant programs.

Date of Government Version: 03/20/2014 Date Data Arrived at EDR: 03/20/2014 Date Made Active in Reports: 04/09/2014

Number of Days to Update: 20

Source: Environmental Protection Agency

Telephone: 202-566-2777 Last EDR Contact: 03/20/2014

Next Scheduled EDR Contact: 07/07/2014 Data Release Frequency: Semi-Annually

Local Lists of Landfill / Solid Waste Disposal Sites

ODI: Open Dump Inventory

An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria.

Date of Government Version: 06/30/1985 Date Data Arrived at EDR: 08/09/2004 Date Made Active in Reports: 09/17/2004 Number of Days to Update: 39 Source: Environmental Protection Agency Telephone: 800-424-9346 Last EDR Contact: 06/09/2004 Next Scheduled EDR Contact: N/A

Data Release Frequency: No Update Planned

DEBRIS REGION 9: Torres Martinez Reservation Illegal Dump Site Locations

A listing of illegal dump sites location on the Torres Martinez Indian Reservation located in eastern Riverside County and northern Imperial County, California.

Date of Government Version: 01/12/2009 Date Data Arrived at EDR: 05/07/2009 Date Made Active in Reports: 09/21/2009

Number of Days to Update: 137

Source: EPA, Region 9 Telephone: 415-947-4219 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: No Update Planned

SWRCY: Recycling Facilities

A listing of recycling center locations.

Date of Government Version: 11/24/2009 Date Data Arrived at EDR: 09/30/2010 Date Made Active in Reports: 10/28/2010

Number of Days to Update: 28

Source: Dept of Environmental Quality

Telephone: 517-241-5719 Last EDR Contact: 05/02/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Varies

HIST LF: Inactive Solid Waste Facilities

The database contains historical information and is no longer updated.

Date of Government Version: 03/01/1997 Date Data Arrived at EDR: 02/28/2003 Date Made Active in Reports: 03/06/2003

Number of Days to Update: 6

Source: Dept of Environmental Quality

Telephone: 517-335-4034 Last EDR Contact: 02/28/2003 Next Scheduled EDR Contact: N/A

Data Release Frequency: No Update Planned

INDIAN ODI: Report on the Status of Open Dumps on Indian Lands

Location of open dumps on Indian land.

Date of Government Version: 12/31/1998 Date Data Arrived at EDR: 12/03/2007 Date Made Active in Reports: 01/24/2008

Number of Days to Update: 52

Source: Environmental Protection Agency

Telephone: 703-308-8245 Last EDR Contact: 05/02/2014

Next Scheduled EDR Contact: 08/18/2014 Data Release Frequency: Varies

Local Lists of Hazardous waste / Contaminated Sites

US CDL: Clandestine Drug Labs

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 12/04/2013 Date Data Arrived at EDR: 12/10/2013 Date Made Active in Reports: 02/13/2014

Number of Days to Update: 65

Source: Drug Enforcement Administration

Telephone: 202-307-1000 Last EDR Contact: 03/04/2014

Next Scheduled EDR Contact: 06/16/2014 Data Release Frequency: Quarterly

DEL SHWS: Delisted List of Contaminated Sites

Sites that have been delisted or deleted from the List of Contaminated Sites. The available documentation for the site does not support it's listing or the site no longer meets criteria specified in rules.

Date of Government Version: 08/01/2013 Date Data Arrived at EDR: 08/01/2013 Date Made Active in Reports: 09/11/2013

Number of Days to Update: 41

Source: Dept of Environmental Quality

Telephone: 517-373-9541 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Varies

CDL: Clandestine Drug Lab Listing

A listing of clandestine drug lab locations.

Date of Government Version: 10/20/2008 Date Data Arrived at EDR: 11/18/2008 Date Made Active in Reports: 11/21/2008

Number of Days to Update: 3

Source: Department of Community Health

Telephone: 517-373-3740 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Varies

US HIST CDL: National Clandestine Laboratory Register

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Date of Government Version: 09/01/2007 Date Data Arrived at EDR: 11/19/2008 Date Made Active in Reports: 03/30/2009

Number of Days to Update: 131

Source: Drug Enforcement Administration

Telephone: 202-307-1000 Last EDR Contact: 03/04/2014

Next Scheduled EDR Contact: 06/16/2014 Data Release Frequency: No Update Planned

Local Land Records

LIENS 2: CERCLA Lien Information

A Federal CERCLA ('Superfund') lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties.

Date of Government Version: 02/18/2014 Date Data Arrived at EDR: 03/18/2014 Date Made Active in Reports: 04/24/2014

Number of Days to Update: 37

Source: Environmental Protection Agency

Telephone: 202-564-6023 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Varies

LIENS: Lien List

An Environmental Lien is a charge, security, or encumbrance upon title to a property to secure the payment of a cost, damage, debt, obligation, or duty arising out of response actions, cleanup, or other remediation of hazardous substances or petroleum products upon a property, including (but not limited to) liens imposed pursuant to CERCLA 42 USC * 9607(1) and similar state or local laws. In other words: a lien placed upon a property's title due to an environmental condition

Date of Government Version: 01/24/2014 Date Data Arrived at EDR: 01/28/2014 Date Made Active in Reports: 03/26/2014

Number of Days to Update: 57

Source: Dept of Environmental Quality

Telephone: 517-241-7603 Last EDR Contact: 04/25/2014

Next Scheduled EDR Contact: 08/04/2014 Data Release Frequency: Varies

Records of Emergency Release Reports

HMIRS: Hazardous Materials Information Reporting System

Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 12/31/2013 Date Data Arrived at EDR: 01/03/2014 Date Made Active in Reports: 02/24/2014

Number of Days to Update: 52

Source: U.S. Department of Transportation

Telephone: 202-366-4555 Last EDR Contact: 04/01/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Annually

PEAS: Pollution Emergency Alerting System

Environmental pollution emergencies reported to the Department of Environmental Quality such as tanker accidents, pipeline breaks, and release of reportable quantities of hazardous substances.

Date of Government Version: 04/10/2014 Date Data Arrived at EDR: 04/11/2014 Date Made Active in Reports: 05/05/2014

Number of Days to Update: 24

Source: Dept of Environmental Quality

Telephone: 517-373-8427 Last EDR Contact: 05/02/2014

Next Scheduled EDR Contact: 06/23/2014 Data Release Frequency: Quarterly

Other Ascertainable Records

RCRA NonGen / NLR: RCRA - Non Generators

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

Date of Government Version: 03/11/2014 Date Data Arrived at EDR: 03/13/2014 Date Made Active in Reports: 04/09/2014

Number of Days to Update: 27

Source: Environmental Protection Agency

Telephone: 312-886-6186 Last EDR Contact: 03/13/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Varies

DOT OPS: Incident and Accident Data

Department of Transporation, Office of Pipeline Safety Incident and Accident data.

Date of Government Version: 07/31/2012 Date Data Arrived at EDR: 08/07/2012 Date Made Active in Reports: 09/18/2012

Number of Days to Update: 42

Source: Department of Transporation, Office of Pipeline Safety

Telephone: 202-366-4595 Last EDR Contact: 02/06/2014

Next Scheduled EDR Contact: 05/19/2014 Data Release Frequency: Varies

DOD: Department of Defense Sites

This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 12/31/2005 Date Data Arrived at EDR: 11/10/2006 Date Made Active in Reports: 01/11/2007

Number of Days to Update: 62

Source: USGS

Telephone: 888-275-8747 Last EDR Contact: 04/18/2014

Next Scheduled EDR Contact: 07/28/2014 Data Release Frequency: Semi-Annually

FUDS: Formerly Used Defense Sites

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 12/31/2012 Date Data Arrived at EDR: 02/28/2014 Date Made Active in Reports: 04/24/2014

Number of Days to Update: 55

Source: U.S. Army Corps of Engineers

Telephone: 202-528-4285 Last EDR Contact: 03/10/2014

Next Scheduled EDR Contact: 06/23/2014 Data Release Frequency: Varies

CONSENT: Superfund (CERCLA) Consent Decrees

Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: 12/31/2013 Date Data Arrived at EDR: 01/24/2014 Date Made Active in Reports: 02/24/2014

Number of Days to Update: 31

Source: Department of Justice, Consent Decree Library

Telephone: Varies

Last EDR Contact: 03/27/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Varies

ROD: Records Of Decision

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 11/25/2013 Date Data Arrived at EDR: 12/12/2013 Date Made Active in Reports: 02/24/2014

Number of Days to Update: 74

Source: EPA

Telephone: 703-416-0223 Last EDR Contact: 03/11/2014

Next Scheduled EDR Contact: 06/23/2014 Data Release Frequency: Annually

UMTRA: Uranium Mill Tailings Sites

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized.

Date of Government Version: 09/14/2010
Date Data Arrived at EDR: 10/07/2011
Date Made Active in Reports: 03/01/2012

Number of Days to Update: 146

Source: Department of Energy Telephone: 505-845-0011 Last EDR Contact: 02/25/2014

Next Scheduled EDR Contact: 06/09/2014 Data Release Frequency: Varies

US MINES: Mines Master Index File

Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

Date of Government Version: 08/01/2013 Date Data Arrived at EDR: 09/05/2013 Date Made Active in Reports: 10/03/2013

Number of Days to Update: 28

Source: Department of Labor, Mine Safety and Health Administration

Telephone: 303-231-5959 Last EDR Contact: 03/05/2014

Next Scheduled EDR Contact: 06/16/2014 Data Release Frequency: Semi-Annually

TRIS: Toxic Chemical Release Inventory System

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/2011 Date Data Arrived at EDR: 07/31/2013 Date Made Active in Reports: 09/13/2013

Number of Days to Update: 44

Source: EPA

Telephone: 202-566-0250 Last EDR Contact: 02/26/2014

Next Scheduled EDR Contact: 06/09/2014 Data Release Frequency: Annually

TSCA: Toxic Substances Control Act

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/2006 Date Data Arrived at EDR: 09/29/2010 Date Made Active in Reports: 12/02/2010

Number of Days to Update: 64

Source: EPA

Telephone: 202-260-5521 Last EDR Contact: 03/28/2014

Next Scheduled EDR Contact: 07/07/2014 Data Release Frequency: Every 4 Years

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 04/09/2009 Date Data Arrived at EDR: 04/16/2009 Date Made Active in Reports: 05/11/2009

Number of Days to Update: 25

Source: EPA/Office of Prevention, Pesticides and Toxic Substances

Telephone: 202-566-1667 Last EDR Contact: 02/24/2014

Next Scheduled EDR Contact: 06/09/2014 Data Release Frequency: Quarterly

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act) A listing of FIFRA/TSCA Tracking System (FTTS) inspections and enforcements.

Date of Government Version: 04/09/2009 Date Data Arrived at EDR: 04/16/2009 Date Made Active in Reports: 05/11/2009

Number of Days to Update: 25

Source: EPA

Telephone: 202-566-1667 Last EDR Contact: 02/24/2014

Next Scheduled EDR Contact: 06/09/2014 Data Release Frequency: Quarterly

HIST FTTS: FIFRA/TSCA Tracking System Administrative Case Listing

A complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006 Date Data Arrived at EDR: 03/01/2007 Date Made Active in Reports: 04/10/2007

Number of Days to Update: 40

Source: Environmental Protection Agency

Telephone: 202-564-2501 Last EDR Contact: 12/17/2007

Next Scheduled EDR Contact: 03/17/2008 Data Release Frequency: No Update Planned

HIST FTTS INSP: FIFRA/TSCA Tracking System Inspection & Enforcement Case Listing

A complete inspection and enforcement case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Date of Government Version: 10/19/2006 Date Data Arrived at EDR: 03/01/2007 Date Made Active in Reports: 04/10/2007

Number of Days to Update: 40

Source: Environmental Protection Agency

Telephone: 202-564-2501 Last EDR Contact: 12/17/2008

Next Scheduled EDR Contact: 03/17/2008 Data Release Frequency: No Update Planned

SSTS: Section 7 Tracking Systems

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/2009 Date Data Arrived at EDR: 12/10/2010 Date Made Active in Reports: 02/25/2011

Number of Days to Update: 77

Source: EPA

Telephone: 202-564-4203 Last EDR Contact: 04/29/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Annually

ICIS: Integrated Compliance Information System

The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.

Date of Government Version: 07/20/2011 Date Data Arrived at EDR: 11/10/2011 Date Made Active in Reports: 01/10/2012

Number of Days to Update: 61

Source: Environmental Protection Agency

Telephone: 202-564-5088 Last EDR Contact: 10/09/2014

Next Scheduled EDR Contact: 07/21/2014 Data Release Frequency: Quarterly

PADS: PCB Activity Database System

PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 06/01/2013 Date Data Arrived at EDR: 07/17/2013 Date Made Active in Reports: 11/01/2013

Number of Days to Update: 107

Source: EPA

Telephone: 202-566-0500 Last EDR Contact: 04/18/2014

Next Scheduled EDR Contact: 07/28/2014 Data Release Frequency: Annually

MLTS: Material Licensing Tracking System

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 07/22/2013 Date Data Arrived at EDR: 08/02/2013 Date Made Active in Reports: 11/01/2013

Number of Days to Update: 91

Source: Nuclear Regulatory Commission

Telephone: 301-415-7169 Last EDR Contact: 03/10/2014

Next Scheduled EDR Contact: 06/23/2014 Data Release Frequency: Quarterly

RADINFO: Radiation Information Database

The Radiation Information Database (RADINFO) contains information about facilities that are regulated by U.S. Environmental Protection Agency (EPA) regulations for radiation and radioactivity.

Date of Government Version: 01/09/2014 Date Data Arrived at EDR: 01/10/2014 Date Made Active in Reports: 03/12/2014

Number of Days to Update: 61

Source: Environmental Protection Agency

Telephone: 202-343-9775 Last EDR Contact: 04/09/2014

Next Scheduled EDR Contact: 07/21/2014 Data Release Frequency: Quarterly

FINDS: Facility Index System/Facility Registry System

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 11/18/2013 Date Data Arrived at EDR: 02/27/2014 Date Made Active in Reports: 03/12/2014

Number of Days to Update: 13

Source: EPA

Telephone: (312) 353-2000 Last EDR Contact: 03/14/2014

Next Scheduled EDR Contact: 06/23/2014 Data Release Frequency: Quarterly

RAATS: RCRA Administrative Action Tracking System

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/1995 Date Data Arrived at EDR: 07/03/1995 Date Made Active in Reports: 08/07/1995

Number of Days to Update: 35

Source: EPA

Telephone: 202-564-4104 Last EDR Contact: 06/02/2008

Next Scheduled EDR Contact: 09/01/2008 Data Release Frequency: No Update Planned

RMP: Risk Management Plans

When Congress passed the Clean Air Act Amendments of 1990, it required EPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. The Risk Management Program Rule (RMP Rule) was written to implement Section 112(r) of these amendments. The rule, which built upon existing industry codes and standards, requires companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program, which includes a(n): Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g the fire department) should an accident occur.

Date of Government Version: 11/01/2013 Date Data Arrived at EDR: 12/12/2013 Date Made Active in Reports: 02/13/2014

Number of Days to Update: 63

Source: Environmental Protection Agency

Telephone: 202-564-8600 Last EDR Contact: 04/28/2014

Next Scheduled EDR Contact: 08/11/2014

Data Release Frequency: Varies

BRS: Biennial Reporting System

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG)

and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/2011 Date Data Arrived at EDR: 02/26/2013 Date Made Active in Reports: 04/19/2013

Number of Days to Update: 52

Source: EPA/NTIS Telephone: 800-424-9346 Last EDR Contact: 02/28/2014

Next Scheduled EDR Contact: 06/09/2014 Data Release Frequency: Biennially

UIC: Underground Injection Wells Database

A listing of underground injection well locations. The UIC Program is responsible for regulating the construction. operation, permitting, and closure of injection wells that place fluids underground for storage or disposal.

Date of Government Version: 11/18/2013 Date Data Arrived at EDR: 11/19/2013 Date Made Active in Reports: 11/26/2013

Number of Days to Update: 7

Source: Dept of Environmental Quality

Telephone: 517-241-1515 Last EDR Contact: 04/18/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Varies

DRYCLEANERS: Drycleaning Establishments A listing of drycleaning facilities in Michigan.

> Date of Government Version: 01/27/2014 Date Data Arrived at EDR: 01/28/2014 Date Made Active in Reports: 03/26/2014

Number of Days to Update: 57

Source: Dept of Environmental Quality

Telephone: 517-335-4586 Last EDR Contact: 04/21/2014

Next Scheduled EDR Contact: 08/04/2014 Data Release Frequency: Annually

NPDES: List of Active NPDES Permits

General information regarding NPDES (National Pollutant Discharge Elimination System) permits and NPDES Storm Water permits.

Date of Government Version: 01/06/2014 Date Data Arrived at EDR: 01/07/2014 Date Made Active in Reports: 02/17/2014

Number of Days to Update: 41

Source: Dept of Environmental Quality

Telephone: 517-241-1300 Last EDR Contact: 04/09/2014

Next Scheduled EDR Contact: 07/21/2014

Data Release Frequency: Varies

AIRS: Permit and Emissions Inventory Data Permit and emissions inventory data.

Date of Government Version: 04/01/2014 Date Data Arrived at EDR: 04/03/2014 Date Made Active in Reports: 05/05/2014

Number of Days to Update: 32

Source: Dept of Environmental Quality Telephone: 517-373-7074 Last EDR Contact: 03/24/2014

Next Scheduled EDR Contact: 07/07/2014

Data Release Frequency: Varies

BEA: Baseline Environmental Assessment Database

A BEA is a document that new or prospective property owners/operations disclose to the DEQ identifying the property as a facility pursuant to Part 201 and Part 213. The Inventory of BEA Facilities overlaps in part with the Part 201 Projects facilities and Part 213 facilities. There may be more than one BEA for each facility.

Date of Government Version: 08/21/2013 Date Data Arrived at EDR: 08/23/2013 Date Made Active in Reports: 09/12/2013

Number of Days to Update: 20

Source: Dept of Environmental Quality Telephone: 517-373-9541 Last EDR Contact: 02/14/2014

Next Scheduled EDR Contact: 06/02/2014
Data Release Frequency: No Update Planned

INDIAN RESERV: Indian Reservations

This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 12/31/2005 Date Data Arrived at EDR: 12/08/2006 Date Made Active in Reports: 01/11/2007

Number of Days to Update: 34

Source: USGS

Telephone: 202-208-3710 Last EDR Contact: 04/18/2014

Next Scheduled EDR Contact: 07/28/2014 Data Release Frequency: Semi-Annually

SCRD DRYCLEANERS: State Coalition for Remediation of Drycleaners Listing

The State Coalition for Remediation of Drycleaners was established in 1998, with support from the U.S. EPA Office of Superfund Remediation and Technology Innovation. It is comprised of representatives of states with established drycleaner remediation programs. Currently the member states are Alabama, Connecticut, Florida, Illinois, Kansas, Minnesota, Missouri, North Carolina, Oregon, South Carolina, Tennessee, Texas, and Wisconsin.

Date of Government Version: 03/07/2011 Date Data Arrived at EDR: 03/09/2011 Date Made Active in Reports: 05/02/2011

Number of Days to Update: 54

Source: Environmental Protection Agency

Telephone: 615-532-8599 Last EDR Contact: 04/21/2014

Next Scheduled EDR Contact: 08/04/2014 Data Release Frequency: Varies

2020 COR ACTION: 2020 Corrective Action Program List

The EPA has set ambitious goals for the RCRA Corrective Action program by creating the 2020 Corrective Action Universe. This RCRA cleanup baseline includes facilities expected to need corrective action. The 2020 universe contains a wide variety of sites. Some properties are heavily contaminated while others were contaminated but have since been cleaned up. Still others have not been fully investigated yet, and may require little or no remediation. Inclusion in the 2020 Universe does not necessarily imply failure on the part of a facility to meet its RCRA obligations.

Date of Government Version: 11/11/2011 Date Data Arrived at EDR: 05/18/2012 Date Made Active in Reports: 05/25/2012

Number of Days to Update: 7

Source: Environmental Protection Agency

Telephone: 703-308-4044 Last EDR Contact: 02/14/2014

Next Scheduled EDR Contact: 05/26/2014 Data Release Frequency: Varies

LEAD SMELTER 1: Lead Smelter Sites

A listing of former lead smelter site locations.

Date of Government Version: 01/29/2013 Date Data Arrived at EDR: 02/14/2013 Date Made Active in Reports: 02/27/2013

Number of Days to Update: 13

Source: Environmental Protection Agency

Telephone: 703-603-8787 Last EDR Contact: 04/04/2014

Next Scheduled EDR Contact: 07/21/2014 Data Release Frequency: Varies

LEAD SMELTER 2: Lead Smelter Sites

A list of several hundred sites in the U.S. where secondary lead smelting was done from 1931and 1964. These sites may pose a threat to public health through ingestion or inhalation of contaminated soil or dust

Date of Government Version: 04/05/2001 Date Data Arrived at EDR: 10/27/2010 Date Made Active in Reports: 12/02/2010

Number of Days to Update: 36

Source: American Journal of Public Health

Telephone: 703-305-6451 Last EDR Contact: 12/02/2009 Next Scheduled EDR Contact: N/A

Data Release Frequency: No Update Planned

PRP: Potentially Responsible Parties

A listing of verified Potentially Responsible Parties

Date of Government Version: 04/15/2013 Date Data Arrived at EDR: 07/03/2013 Date Made Active in Reports: 09/13/2013

Number of Days to Update: 72

Source: EPA

Telephone: 202-564-6023 Last EDR Contact: 04/04/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Quarterly

FEDLAND: Federal and Indian Lands

Federally and Indian administrated lands of the United States. Lands included are administrated by: Army Corps of Engineers, Bureau of Reclamation, National Wild and Scenic River, National Wildlife Refuge, Public Domain Land, Wilderness, Wilderness Study Area, Wildlife Management Area, Bureau of Indian Affairs, Bureau of Land Management, Department of Justice, Forest Service, Fish and Wildlife Service, National Park Service.

Date of Government Version: 12/31/2005 Date Data Arrived at EDR: 02/06/2006 Date Made Active in Reports: 01/11/2007

Number of Days to Update: 339

Source: U.S. Geological Survey Telephone: 888-275-8747 Last EDR Contact: 04/18/2014

Next Scheduled EDR Contact: 07/28/2014

Data Release Frequency: N/A

US AIRS (AFS): Aerometric Information Retrieval System Facility Subsystem (AFS)

The database is a sub-system of Aerometric Information Retrieval System (AIRS). AFS contains compliance data on air pollution point sources regulated by the U.S. EPA and/or state and local air regulatory agencies. This information comes from source reports by various stationary sources of air pollution, such as electric power plants, steel mills, factories, and universities, and provides information about the air pollutants they produce. Action, air program, air program pollutant, and general level plant data. It is used to track emissions and compliance data from industrial plants.

Date of Government Version: 10/23/2013 Date Data Arrived at EDR: 11/06/2013 Date Made Active in Reports: 12/06/2013

Number of Days to Update: 30

Source: EPA

Telephone: 202-564-5962 Last EDR Contact: 03/31/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Annually

US AIRS MINOR: Air Facility System Data A listing of minor source facilities.

Date of Government Version: 10/23/2013 Date Data Arrived at EDR: 11/06/2013 Date Made Active in Reports: 12/06/2013

Number of Days to Update: 30

Source: EPA

Telephone: 202-564-5962 Last EDR Contact: 03/31/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Annually

Financial Assurance 1: Financial Assurance Information Listing

Financial assurance information.

Date of Government Version: 01/08/2014 Date Data Arrived at EDR: 01/13/2014 Date Made Active in Reports: 02/17/2014

Number of Days to Update: 35

Source: Dept of Environmental Quality

Telephone: 517-335-6610 Last EDR Contact: 04/07/2014

Next Scheduled EDR Contact: 07/21/2014 Data Release Frequency: Varies

Financial Assurance 2: Financial Assurance Information Listing

A listing of financial assurance information for solid waste facilities. Financial assurance is intended to ensure that resources are available to pay for the cost of closure, post-closure care, and corrective measures if the owner or operator of a regulated facility is unable or unwilling to pay.

Date of Government Version: 01/05/2011 Date Data Arrived at EDR: 01/07/2011 Date Made Active in Reports: 02/14/2011

Number of Days to Update: 38

Source: Dept of Environmental Quality

Telephone: 517-335-4034 Last EDR Contact: 03/31/2014

Next Scheduled EDR Contact: 07/14/2014 Data Release Frequency: Varies

US FIN ASSUR: Financial Assurance Information

All owners and operators of facilities that treat, store, or dispose of hazardous waste are required to provide proof that they will have sufficient funds to pay for the clean up, closure, and post-closure care of their facilities.

Date of Government Version: 02/25/2014 Date Data Arrived at EDR: 02/27/2014 Date Made Active in Reports: 04/09/2014

Number of Days to Update: 41

Source: Environmental Protection Agency

Telephone: 202-566-1917 Last EDR Contact: 02/14/2014

Next Scheduled EDR Contact: 06/02/2014 Data Release Frequency: Quarterly

COAL ASH: Coal Ash Disposal Sites

Coal fired power plants in Southeast Michigan that have coal ash handling on site.

Date of Government Version: 07/12/2013 Date Data Arrived at EDR: 07/12/2013 Date Made Active in Reports: 08/01/2013

Number of Days to Update: 20

Source: Dept of Environmental Quality

Telephone: 586-753-3754 Last EDR Contact: 04/07/2014

Next Scheduled EDR Contact: 07/21/2014 Data Release Frequency: Varies

PCB TRANSFORMER: PCB Transformer Registration Database

The database of PCB transformer registrations that includes all PCB registration submittals.

Date of Government Version: 02/01/2011 Date Data Arrived at EDR: 10/19/2011 Date Made Active in Reports: 01/10/2012

Number of Days to Update: 83

Source: Environmental Protection Agency

Telephone: 202-566-0517 Last EDR Contact: 05/02/2014

Next Scheduled EDR Contact: 08/11/2014 Data Release Frequency: Varies

COAL ASH EPA: Coal Combustion Residues Surface Impoundments List

A listing of coal combustion residues surface impoundments with high hazard potential ratings.

Date of Government Version: 08/17/2010 Date Data Arrived at EDR: 01/03/2011 Date Made Active in Reports: 03/21/2011

Number of Days to Update: 77

Source: Environmental Protection Agency

Telephone: N/A

Last EDR Contact: 03/11/2014

Next Scheduled EDR Contact: 06/23/2014
Data Release Frequency: Varies

WDS: Waste Data System

The Waste Data System (WDS) tracks activities at facilities regulated by the Solid Waste, Scrap Tire, Hazardous Waste, and Liquid Industrial Waste programs.

Date of Government Version: 03/04/2014 Date Data Arrived at EDR: 03/06/2014 Date Made Active in Reports: 03/27/2014

Number of Days to Update: 21

Source: Dept of Environmental Quality Telephone: 517-284-6562

Last EDR Contact: 02/24/2014

Next Scheduled EDR Contact: 06/09/2014 Data Release Frequency: Quarterly

COAL ASH DOE: Sleam-Electric Plan Operation Data

A listing of power plants that store ash in surface ponds.

Date of Government Version: 12/31/2005 Date Data Arrived at EDR: 08/07/2009 Date Made Active in Reports: 10/22/2009

Number of Days to Update: 76

Source: Department of Energy Telephone: 202-586-8719 Last EDR Contact: 04/18/2014

Next Scheduled EDR Contact: 07/28/2014 Data Release Frequency: Varies

EPA WATCH LIST: EPA WATCH LIST

EPA maintains a "Watch List" to facilitate dialogue between EPA, state and local environmental agencies on enforcement matters relating to facilities with alleged violations identified as either significant or high priority. Being on the Watch List does not mean that the facility has actually violated the law only that an investigation by EPA or a state or local environmental agency has led those organizations to allege that an unproven violation has in fact occurred. Being on the Watch List does not represent a higher level of concern regarding the alleged violations that were detected, but instead indicates cases requiring additional dialogue between EPA, state and local agencies - primarily because of the length of time the alleged violation has gone unaddressed or unresolved.

Date of Government Version: 06/30/2013 Date Data Arrived at EDR: 08/13/2013 Date Made Active in Reports: 09/13/2013

Number of Days to Update: 31

Source: Environmental Protection Agency

Telephone: 617-520-3000 Last EDR Contact: 02/10/2014

Next Scheduled EDR Contact: 05/26/2014 Data Release Frequency: Quarterly

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP: EDR Proprietary Manufactured Gas Plants

The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

Date of Government Version: N/A Date Data Arrived at EDR: N/A Date Made Active in Reports: N/A

Number of Days to Update: N/A

Source: EDR, Inc. Telephone: N/A Last EDR Contact: N/A

Next Scheduled EDR Contact: N/A

Data Release Frequency: No Update Planned

EDR US Hist Auto Stat: EDR Exclusive Historic Gas Stations

EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Date of Government Version: N/A Date Data Arrived at EDR: N/A Date Made Active in Reports: N/A

Number of Days to Update: N/A

Source: EDR, Inc. Telephone: N/A Last EDR Contact: N/A

Next Scheduled EDR Contact: N/A Data Release Frequency: Varies

EDR US Hist Cleaners: EDR Exclusive Historic Dry Cleaners

EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Date of Government Version: N/A Source: EDR, Inc.
Date Data Arrived at EDR: N/A Telephone: N/A
Date Made Active in Reports: N/A Last EDR Contact: N/A

Number of Days to Update: N/A Next Scheduled EDR Contact: N/A

Data Release Frequency: Varies

EDR US Hist Cleaners: EDR Proprietary Historic Dry Cleaners - Cole

Date of Government Version: N/A

Date Data Arrived at EDR: N/A

Date Made Active in Reports: N/A

Last EDR Contact: N/A

Number of Days to Update: N/A Next Scheduled EDR Contact: N/A Data Release Frequency: Varies

EDR US Hist Auto Stat: EDR Proprietary Historic Gas Stations - Cole

Date of Government Version: N/A

Date Data Arrived at EDR: N/A

Date Made Active in Reports: N/A

Last EDR Contact: N/A

Number of Days to Update: N/A Next Scheduled EDR Contact: N/A Data Release Frequency: Varies

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA HWS: Recovered Government Archive State Hazardous Waste Facilities List

The EDR Recovered Government Archive State Hazardous Waste database provides a list of SHWS incidents derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the Department of Environmental Quality in Michigan.

Date of Government Version: N/A
Date Data Arrived at EDR: 07/01/2013
Date Made Active in Reports: 12/24/2013

Number of Days to Update: 176

Source: Department of Environmental Quality

Telephone: N/A

Last EDR Contact: 06/01/2012 Next Scheduled EDR Contact: N/A Data Release Frequency: Varies

RGA LF: Recovered Government Archive Solid Waste Facilities List

The EDR Recovered Government Archive Landfill database provides a list of landfills derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the Department of Environmental Quality in Michigan.

Date of Government Version: N/A
Date Data Arrived at EDR: 07/01/2013
Date Made Active in Reports: 01/13/2014

Number of Days to Update: 196

Source: Department of Environmental Quality

Telephone: N/A

Last EDR Contact: 06/01/2012 Next Scheduled EDR Contact: N/A Data Release Frequency: Varies

RGA LUST: Recovered Government Archive Leaking Underground Storage Tank

The EDR Recovered Government Archive Leaking Underground Storage Tank database provides a list of LUST incidents derived from historical databases and includes many records that no longer appear in current government lists. Compiled from Records formerly available from the Department of Environmental Quality in Michigan.

Date of Government Version: N/A Date Data Arrived at EDR: 07/01/2013 Date Made Active in Reports: 12/24/2013

Number of Days to Update: 176

Source: Department of Environmental Quality

Telephone: N/A

Last EDR Contact: 06/01/2012 Next Scheduled EDR Contact: N/A Data Release Frequency: Varies

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

CT MANIFEST: Hazardous Waste Manifest Data

Facility and manifest data. Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a tsd facility.

Date of Government Version: 07/30/2013 Date Data Arrived at EDR: 08/19/2013 Date Made Active in Reports: 10/03/2013

Number of Days to Update: 45

Source: Department of Energy & Environmental Protection

Telephone: 860-424-3375 Last EDR Contact: 02/21/2014

Next Scheduled EDR Contact: 06/02/2014 Data Release Frequency: Annually

NJ MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2011 Date Data Arrived at EDR: 07/19/2012 Date Made Active in Reports: 08/28/2012

Number of Days to Update: 40

Source: Department of Environmental Protection

Telephone: N/A

Last EDR Contact: 04/18/2014

Next Scheduled EDR Contact: 07/28/2014 Data Release Frequency: Annually

NY MANIFEST: Facility and Manifest Data

Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD

facility.

Date of Government Version: 02/28/2014 Date Data Arrived at EDR: 03/12/2014 Date Made Active in Reports: 04/29/2014

Number of Days to Update: 48

Source: Department of Environmental Conservation

Telephone: 518-402-8651 Last EDR Contact: 03/12/2014

Next Scheduled EDR Contact: 05/19/2014 Data Release Frequency: Annually

PA MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2012 Date Data Arrived at EDR: 07/24/2013 Date Made Active in Reports: 08/19/2013

Number of Days to Update: 26

Source: Department of Environmental Protection

Telephone: 717-783-8990 Last EDR Contact: 04/21/2014

Next Scheduled EDR Contact: 08/04/2014 Data Release Frequency: Annually

RI MANIFEST: Manifest information

Hazardous waste manifest information

Date of Government Version: 12/31/2012 Date Data Arrived at EDR: 06/21/2013 Date Made Active in Reports: 08/05/2013

Number of Days to Update: 45

Source: Department of Environmental Management

Telephone: 401-222-2797 Last EDR Contact: 02/24/2014

Next Scheduled EDR Contact: 06/09/2014 Data Release Frequency: Annually

WI MANIFEST: Manifest Information

Hazardous waste manifest information.

Date of Government Version: 12/31/2012 Date Data Arrived at EDR: 08/09/2013 Date Made Active in Reports: 09/27/2013

Number of Days to Update: 49

Source: Department of Natural Resources

Telephone: N/A

Last EDR Contact: 03/17/2014

Next Scheduled EDR Contact: 06/30/2014 Data Release Frequency: Annually

Oil/Gas Pipelines: This data was obtained by EDR from the USGS in 1994. It is referred to by USGS as GeoData Digital Line Graphs from 1:100,000-Scale Maps. It was extracted from the transportation category including some oil, but primarily gas pipelines.

Electric Power Transmission Line Data Source: Rextag Strategies Corp. Telephone: (281) 769-2247

U.S. Electric Transmission and Power Plants Systems Digital GIS Data

Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:

Source: American Hospital Association, Inc.

Telephone: 312-280-5991

The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing

Source: Centers for Medicare & Medicaid Services

Telephone: 410-786-3000

A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services,

a federal agency within the U.S. Department of Health and Human Services.

Nursing Homes

Source: National Institutes of Health

Telephone: 301-594-6248

Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools

Source: National Center for Education Statistics

Telephone: 202-502-7300

The National Center for Education Statistics' primary database on elementary

and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.

Private Schools

Source: National Center for Education Statistics

Telephone: 202-502-7300

The National Center for Education Statistics' primary database on private school locations in the United States.

Daycare Centers: Day Care Centers, Group & Family Homes

Source: Bureau of REgulatory Services

Telephone: 517-373-8300

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 2003 & 2011 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005 and 2010 from the U.S. Fish and Wildlife Service.

State Wetlands Data: Wetlands Inventory Source: Department of Natural Resources

Telephone: 517-241-2254

Scanned Digital USGS 7.5' Topographic Map (DRG)

Source: United States Geologic Survey

A digital raster graphic (DRG) is a scanned image of a U.S. Geological Survey topographic map. The map images are made by scanning published paper maps on high-resolution scanners. The raster image is georeferenced and fit to the Universal Transverse Mercator (UTM) projection.

STREET AND ADDRESS INFORMATION

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GEOCHECK®-PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

2654 20TH ST 2654 20TH ST PORT HURON, MI 48060

TARGET PROPERTY COORDINATES

Latitude (North): 42.9541 - 42° 57' 14.76" Longitude (West): 82.4455 - 82° 26' 43.80"

Universal Tranverse Mercator: Zone 17 UTM X (Meters): 382087.8 UTM Y (Meters): 4756516.5

Elevation: 610 ft. above sea level

USGS TOPOGRAPHIC MAP

Target Property Map: 42082-H4 PORT HURON, MI CA08

Most Recent Revision: 1991

EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principal investigative components:

- 1. Groundwater flow direction, and
- 2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

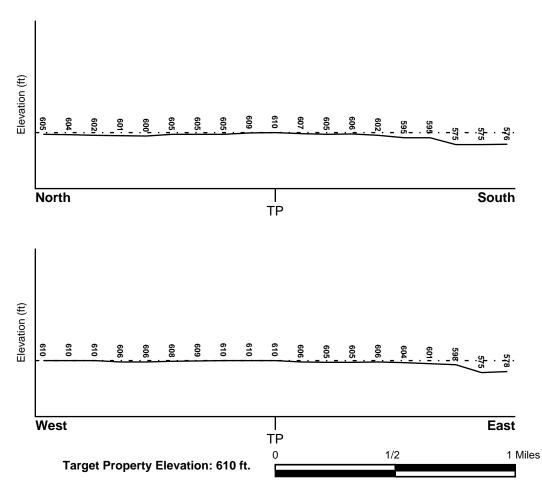
TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

TARGET PROPERTY TOPOGRAPHY

General Topographic Gradient: General East

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7.5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

FEMA Flood

Target Property County ST CLAIR, MI

Electronic Data
YES - refer to the Overview Map and Detail Map

Flood Plain Panel at Target Property:

26147C - FEMA DFIRM Flood data

Additional Panels in search area:

Not Reported

NATIONAL WETLAND INVENTORY

NWI Electronic

NWI Quad at Target Property

Data Coverage

PORT HURON

YES - refer to the Overview Map and Detail Map

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Site-Specific Hydrogeological Data*:

Search Radius: 1.25 miles Status: Not found

AQUIFLOW®

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

 LOCATION
 GENERAL DIRECTION

 MAP ID
 FROM TP
 GROUNDWATER FLOW

 Not Reported
 The state of the

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

GEOLOGIC AGE IDENTIFICATION

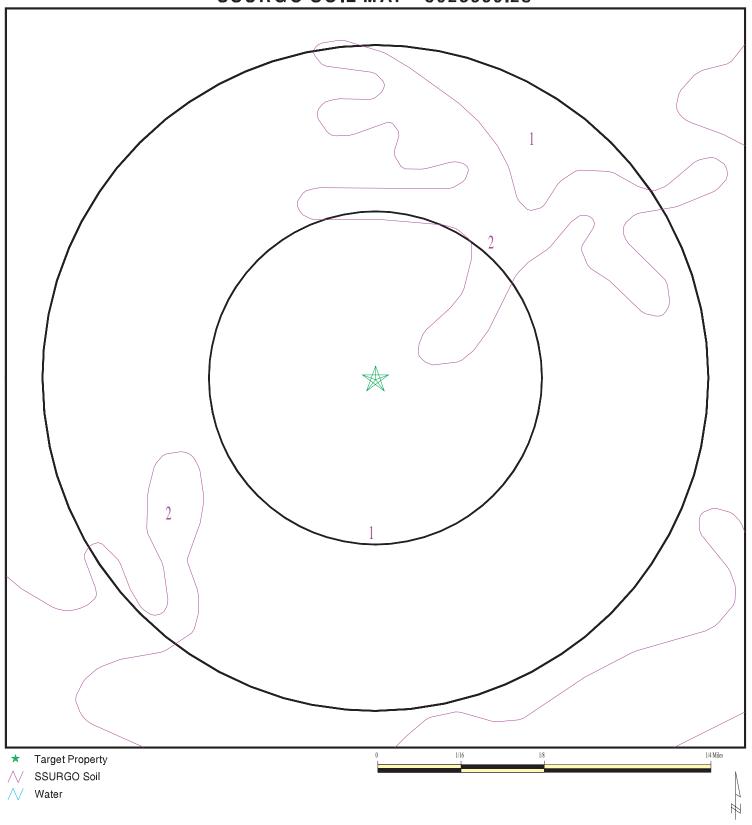
Era: Paleozoic Category: Stratified Sequence

System: Devonian
Series: Upper Devonian

Code: D3 (decoded above as Era, System & Series)

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

SSURGO SOIL MAP - 3925559.2s



SITE NAME: 2654 20th St ADDRESS: 2654 20th St

Port Huron MI 48060 LAT/LONG: 42.9541 / 82.4455 CLIENT: Applied Science & Technology CONTACT: Penelope Richardson-Bristol INQUIRY #: 3925559.2s

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GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. The following information is based on Soil Conservation Service SSURGO data.

Soil Map ID: 1

Soil Component Name: Wainola

Soil Surface Texture: fine sand

Hydrologic Group: Class B - Moderate infiltration rates. Deep and moderately deep,

moderately well and well drained soils with moderately coarse

textures.

Soil Drainage Class: Somewhat poorly drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: Low

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

| | Soil Layer Information | | | | | | |
|-------|------------------------|-----------|--------------------|---|---|-----------------------------|----------------------|
| Layer | Boundary | | | Classi | fication | Saturated hydraulic | |
| | er Upper Lower S | | Soil Texture Class | AASHTO Group Unified Soil | | conductivity micro m/sec | Soil Reaction (pH) |
| 1 | 0 inches | 9 inches | fine sand | Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand. | COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand. | Max: 141 Min: 42 | Max: 7.3 Min: 6.1 |
| 2 | 9 inches | 37 inches | fine sand | Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand. | COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand. | Max: 141 Min: 42 | Max: 6.6 Min: 5.1 |
| 3 | 37 inches | 61 inches | fine sand | Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand. | COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand. | Max: 141 Min: 42 | Max: 8.4 Min: 6.6 |

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Map ID: 2

Soil Component Name: Rousseau

Soil Surface Texture: fine sand

Hydrologic Group: Class A - High infiltration rates. Soils are deep, well drained to

excessively drained sands and gravels.

Soil Drainage Class: Well drained

Hydric Status: Partially hydric

Corrosion Potential - Uncoated Steel: Low

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

| | Soil Layer Information | | | | | | |
|-------|------------------------|-----------|--------------------|---|---|-----------------------------|----------------------|
| | Boundary | | | Classi | fication | Saturated hydraulic | |
| Layer | Upper | Lower | Soil Texture Class | AASHTO Group | Unified Soil | conductivity micro m/sec | |
| 1 | 0 inches | 5 inches | fine sand | Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand. | COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand. | Max: 141 Min: 42 | Max: 7.3 Min: 4.5 |
| 2 | 5 inches | 29 inches | fine sand | Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand. | COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand. | Max: 141 Min: 42 | Max: 7.3 Min: 4.5 |
| 3 | 29 inches | 63 inches | sand | Granular materials (35 pct. or less passing No. 200), Silty, or Clayey Gravel and Sand. | COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand. | Max: 141 Min: 42 | Max: 7.3 Min: 5.6 |

LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

WELL SEARCH DISTANCE INFORMATION

DATABASE SEARCH DISTANCE (miles)

Federal USGS 1.000

Federal FRDS PWS Nearest PWS within 1 mile

State Database 1.000

FEDERAL USGS WELL INFORMATION

LOCATION MAP ID WELL ID FROM TP

USGS40000484306 1/2 - 1 Mile ENE

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

LOCATION WELL ID FROM TP

MAP ID

Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

No PWS System Found

LOCATION MAP ID WELL ID FROM TP

2 1/2 - 1 Mile WSW MI3000000166026

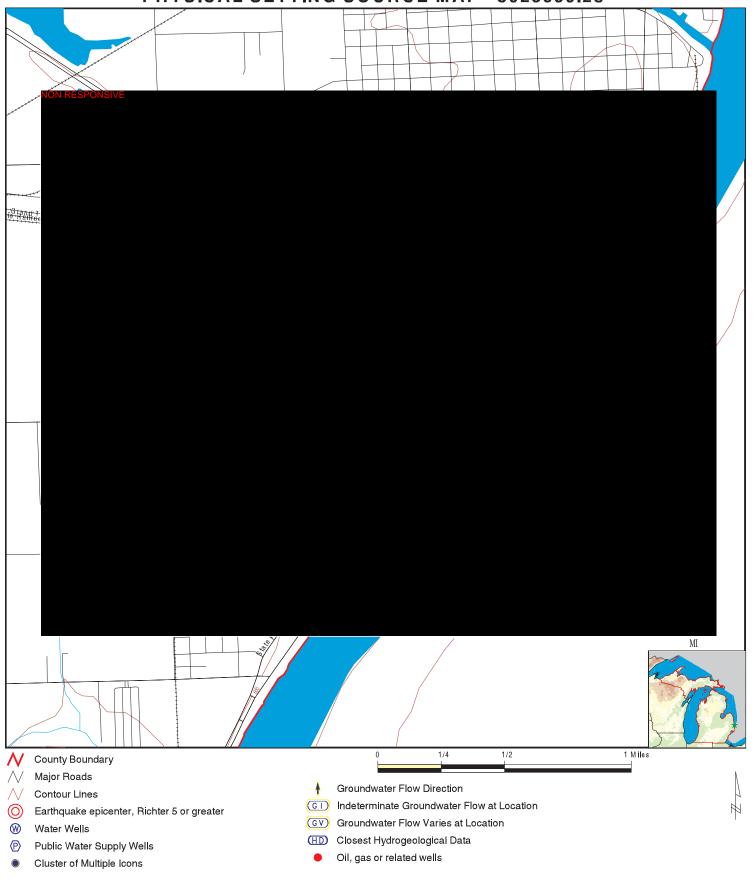
OTHER STATE DATABASE INFORMATION

STATE OIL/GAS WELL INFORMATION

LOCATION MAP ID FROM TP WELL ID

MIOG80000016083 1/4 - 1/2 Mile WSW

PHYSICAL SETTING SOURCE MAP - 3925559.2s



SITE NAME: 2654 20th St ADDRESS: 2654 20th St

Port Huron MI 48060 LAT/LONG: 42.9541 / 82.4455 CLIENT: Applied Science & Technology CONTACT: Penelope Richardson-Bristol

INQUIRY#: 3925559.2s

DATE: May 06, 2014 4:41 pm

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID Direction Distance

Elevation Database EDR ID Number

1/2 - 1 Mile Lower

Org. Identifier: USGS-MI

Formal name: USGS Michigan Water Science Center

Monloc Identifier: USGS-425736082255801

Monloc name: 06N 17E 15BDD01 ST. CLAIR CO (CN TUNNEL, G2)

Monloc type: Well

Monloc desc: Not Reported

Huc code: 04090001 Drainagearea value: Not Reported Not Reported Contrib drainagearea: Not Reported Drainagearea Units: 42.9600302 Contrib drainagearea units: Not Reported Latitude: Longitude: -82.432692 Sourcemap scale: 24000 Horiz Acc measure: Horiz Acc measure units: minutes

Horiz Collection method: Interpolated from map

Horiz coord refsys: NAD83 Vert measure val: 600 Vert measure units: 600 Vert measure val: 2.5

Vert accmeasure units: feet

Vertcollection method: Interpolated from topographic map

Vert coord refsys: NGVD29 Countrycode: US

Aquifername: Not Reported Formation type: Not Reported Aquifer type: Not Reported

Construction date: Not Reported Welldepth: 111 Welldepth units: ft Wellholedepth: 112

Wellholedepth units: ft

Ground-water levels, Number of Measurements: 0

NON RESPONSIVE

Well type: Household

Wssn: 0

 Well num:
 Not Reported
 Driller id:
 1528

 Const date:
 2004-03-31 00:00:00.000
 Case type:
 PVC Plastic

 Case dia:
 5

 Case depth:
 112

 Screen frm:
 112

 Screen to:
 117

 Swl:
 17

 Test depth:
 100

 Test hours:
 1

Test rate: 20 Test methd: Air Grouted: 1 Pmp cpcity: 10

Latitude: 42.948752 Longitude: -82.463016

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS

Methd coll: Address Matching-House Number Elevation: Elev methd: Topographoc Map Interpolation Depth flag: Not Reported Elev flag: Not Reported Swl flag: Not Reported Elev dem: 607 Elev dif: 3 Elev miv: 610 Aq code: Drift Well Aq flag: Screen Condition (Screen Depth > 0 and Screen Depth <= Well Depth) AQ_CODE is set to "D" Pct aq: 12 Pct aq r: 0 12 Pct aq d: 0 Pct maq: 0 Pct maq d: Pct mag r: 0 Pct cm: 87 Pct cm d: 85 Pct cm r: 0 0 Pct pcm: 0 Pct pcm d: Pct pcm r: 0 Pct na: 1 0 Pct na d: Pct na r: 1 Pct flag: Not Reported Rock top: 114 D r type: Not Reported 0 Spc cpcity: A thicknes: 6 A pct aq: 50 A pct mag: 0 A pct pcm: 0 A pct cm: 50 0 A pct na: A thickns2: 100 A pct aq2: 3 0 A pct maq2: 0 A pct pcm2: 0 A pct cm2: 97 A pct na2: F A hit swl: F A hit top: A hit rock: F A sc lith1: Shale A sc Imod1: Not Reported A sc Imaq1: CM Sand & Gravel A sc lpct1: 60 A sc lith2: A sc Imod2: Not Reported A sc Imaq2: AQ A sc lpct2: 40 Pct aq 1: 55 Pct mag 1: 0 Pct cm 1: 40 Pct pcm 1: 0 Pct na 1: 5 0 0 Pct aq 2: Pct maq 2: Pct cm 2: 100 Pct pcm 2: 0 Pct na 2: 0 Pct aq 3: 0 Pct maq 3: 0 Pct cm 3: 100 Pct na 3: 0 Pct pcm 3: 0 Pct maq 4: 0 Pct aq 4: 0 Pct cm 4: 0 100 Pct pcm 4: Pct na 4: 0 Pct aq 5: 0 Pct maq 5: 0 Pct cm 5: 100 0 Pct na 5: Pct pcm 5: 0 0 Pct maq 6: 0 Pct aq 6: Pct cm 6: 0 0 Pct pcm 6: Pct na 6: 0 Pct aq 7: 0 Pct maq 7: 0 Pct cm 7: 0 Pct pcm 7: 0 Pct na 7: 0 Pct maq 8: Pct aq 8: 0 0 Pct cm 8: 0 Pct pcm 8: 0 Pct na 8: 0 Pct aq 9: 0 0 Pct cm 9: 0 Pct maq 9: 0 0 Pct pcm 9: Pct na 9: Pct aq 10: 0 Pct mag 10: 0 Pct cm 10: 0 Pct pcm 10: 0 Pct na 10: 0 Pct aq 11: 0 Pct maq 11: 0 Pct cm 11: 0 Pct pcm 11: Pct na 11: 0 0 Pct aq 12: 0 Pct mag 12: 0 Pct cm 12: 0 Pct pcm 12: 0 0 0 Pct na 12: Pct aq 13: 0 0 Pct cm 13: Pct maq 13: Pct na 13: Pct pcm 13: 0 0

GEOCHECK®-PHYSICAL SETTING SOURCE MAP FINDINGS

 Within sec:
 Y

 Aq code 1:
 D

 Hit swl:
 F

 Athk2:
 100

 Horiz Conduct:
 .0301

 Vert Conduct:
 .0001

 T2:
 3.0097

 D50plek:
 .75836

Loc match: Y

GEOCHECK®-PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID Direction Distance

istance Database EDR ID Number

1 WSW OIL_GAS MIOG80000016083 1/4 - 1/2 Mile

Api wellno: 21147133520000

Opno: 264

Operator Name: BECKER VERNIE

Operator Status: Inactive-no active wells at present

Operator City: Not Reported Operator State: Not Reported

Permit no: 13352 Lease name: SMITH, H. A.

Well no:

Deepestfmtn: DUND Obj fmtn: Not Reported

Drillerstd: 630 Truetd: 0
County: SAINT CLAIR Slant: V

Well type: Dry Hole Well status: Plugging Approved

Source loc: Wh sec: С 16 Wh twpn: 6 Wh twpd: Ν Е Wh rngn: 17 Wh rngd: SE Wh qqq: Wh qq: SE

Wh q: SW
Wh lat: 42.9526
Wh long: -82.45285
Wh georef x: 789148.67
Wh georef y: 273039.73
Bh georef x: 789148.67
Bh georef y: 273039.73

Bh sourceloc: C
Bh lat: 42.9526
Bh long: -82.45285

Site id: MIOG80000016083

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

State Database: MI Radon

Radon Test Results

| Zipcode | Test Date | LT Sign | Resul |
|---------|------------|---------|-------|
| 48060 | 11/18/1998 | | 1.5 |
| 48060 | 11/8/1996 | | 1.5 |
| 48060 | 2/18/2000 | | 1.6 |
| 48060 | 3/20/1995 | | 1.5 |
| 48060 | 11/19/2001 | | 1.3 |
| 48060 | 12/14/2009 | | 1.4 |
| | 5/26/2007 | | 1.4 |
| 48060 | 12/4/2006 | | |
| 48060 | | | 1.3 |
| 48060 | 12/6/1996 | | 1.2 |
| 48060 | 11/30/1993 | | 1.3 |
| 48060 | 3/27/2007 | | 1.2 |
| 48060 | 12/16/2000 | | 1.2 |
| 48060 | 11/24/2004 | | 1.2 |
| 48060 | 1/17/2006 | | 1.2 |
| 48060 | 7/31/2006 | | 1.2 |
| 48060 | 11/25/2000 | | 1.2 |
| 48060 | 11/13/2006 | | 1.0 |
| 48060 | 5/18/1998 | | 1.9 |
| 48060 | 10/11/2008 | | 1.8 |
| 48060 | 10/26/2009 | | 1.8 |
| 48060 | 12/4/2006 | | 1.8 |
| 48060 | 8/21/2009 | | 1.7 |
| 48060 | 12/20/1996 | | 1.6 |
| 48060 | 3/24/2008 | < | 0.3 |
| 48060 | 3/5/1997 | < | 0.3 |
| 48060 | 5/29/2007 | < | 0.3 |
| 48060 | 11/7/2006 | < | 0.3 |
| 48060 | 11/2/2006 | < | 0.3 |
| 48060 | 11/20/2006 | < | 0.3 |
| 48060 | 8/22/2005 | < | 0.3 |
| 48060 | 2/17/2006 | < | 0.3 |
| 48060 | 3/22/2004 | | 0.5 |
| 48060 | 2/9/2007 | | 0.5 |
| 48060 | 6/16/2006 | | 0.5 |
| 48060 | 11/1/2001 | < | 0.3 |
| 48060 | 7/14/2004 | < | 0.3 |
| 48060 | 12/3/2001 | < | 0.3 |
| 48060 | 1/30/2006 | < | 0.3 |
| 48060 | 2/16/1995 | | 0.4 |
| 48060 | 1/23/1995 | | 0.4 |
| 48060 | 4/25/1994 | | 0.4 |
| 48060 | 5/22/2009 | < | 0.3 |
| 48060 | 3/6/2004 | < | 0.3 |
| 48060 | 5/24/2002 | < | 0.3 |
| 48060 | 1/18/2006 | < | 0.3 |
| 48060 | 1/11/2006 | < | 0.3 |
| 48060 | | | |

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

| | 2/6/2007 | < | 0.3 |
|-------|------------|---|-----|
| 48060 | 4/25/1997 | < | 0.3 |
| 48060 | 6/30/1997 | < | 0.3 |
| 48060 | 8/4/1997 | < | 0.3 |
| 48060 | 3/27/1999 | • | 0.8 |
| 48060 | 12/9/1996 | | 0.8 |
| 48060 | 5/7/1997 | | 0.9 |
| 48060 | 6/13/2003 | | 0.8 |
| 48060 | 2/10/1997 | | 0.9 |
| 48060 | 1/11/1997 | | 0.9 |
| 48060 | 4/27/2006 | | 0.6 |
| 48060 | 10/18/2008 | | 0.7 |
| 48060 | 6/11/2007 | | 0.8 |
| 48060 | 12/3/2007 | | 0.8 |
| 48060 | 2/15/2008 | | 0.8 |
| 48060 | 4/2/2001 | | 0.7 |
| 48060 | 11/24/2007 | | 0.9 |
| 48060 | 7/30/2009 | | 0.7 |
| 48060 | 1/19/2010 | | 0.8 |
| 48060 | 1/29/2010 | | 0.8 |
| 48060 | 1/5/2010 | | 0.8 |
| 48060 | 2/9/2009 | | 0.8 |
| 48060 | 11/12/1996 | | 0.5 |
| 48060 | 11/19/1996 | | 0.5 |
| 48060 | 11/23/1996 | | 0.5 |
| 48060 | 2/28/1997 | | 0.7 |
| 48060 | 2/3/1997 | | 0.5 |
| 48060 | 7/6/2002 | | 0.5 |
| 48060 | 4/5/2007 | | 2.4 |
| 48060 | 11/10/1994 | | 2.2 |
| 48060 | 3/1/2007 | | 3.0 |
| 48060 | 2/13/2008 | | 3.0 |
| 48060 | 11/9/2002 | | 2.8 |
| 48060 | 12/4/2006 | | 2.7 |
| 48060 | 5/13/2006 | | 2.8 |
| 48060 | 11/30/1993 | < | 0.3 |
| 48060 | 2/10/1994 | < | 0.3 |
| 48060 | 11/30/1993 | < | 0.3 |
| 48060 | 2/14/1995 | < | 0.3 |
| 48060 | 2/19/2000 | < | 0.3 |
| 48060 | 10/15/2007 | | 3.1 |
| 48060 | 3/23/2009 | < | 0.3 |
| 48060 | 6/25/2004 | | 3.0 |
| 48060 | 4/24/2009 | < | 0.3 |
| 48060 | 11/30/1993 | | 3.4 |
| 48060 | 1/26/2009 | < | 0.3 |
| 48060 | 12/5/2006 | | 4.6 |
| 48060 | 3/3/2007 | | 4.7 |
| 48060 | 8/24/2009 | | 5.3 |
| 48060 | 1/16/2007 | | 4.8 |
| 48060 | 11/24/2007 | | 4.8 |
| 48060 | 4/11/2007 | | 2.0 |
| 48060 | 4/21/2000 | | 2.0 |
| | | | |

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

Federal EPA Radon Zone for ST CLAIR County: 3

Note: Zone 1 indoor average level > 4 pCi/L.

: Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.

: Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for Zip Code: 48060

Number of sites tested: 11

| Area | Average Activity | % <4 pCi/L | % 4-20 pCi/L | % >20 pCi/L |
|--|-----------------------------|----------------------|--------------------|--------------------|
| Living Area - 1st Floor Living Area - 2nd Floor | 0.673 pCi/L Not Reported | 100% Not Reported | 0% Not Reported | 0% Not Reported |
| Basement | 1.290 pCi/L | 100% | 0% | 0% |

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)

Source: United States Geologic Survey

EDR acquired the USGS 7.5' Digital Elevation Model in 2002 and updated it in 2006. The 7.5 minute DEM corresponds to the USGS 1:24,000- and 1:25,000-scale topographic quadrangle maps. The DEM provides elevation data with consistent elevation units and projection.

Scanned Digital USGS 7.5' Topographic Map (DRG)

Source: United States Geologic Survey

A digital raster graphic (DRG) is a scanned image of a U.S. Geological Survey topographic map. The map images are made by scanning published paper maps on high-resolution scanners. The raster image is georeferenced and fit to the Universal Transverse Mercator (UTM) projection.

HYDROLOGIC INFORMATION

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 2003 & 2011 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002, 2005 and 2010 from the U.S. Fish and Wildlife Service.

State Wetlands Data: Wetlands Inventory Source: Department of Natural Resources

Telephone: 517-241-2254

HYDROGEOLOGIC INFORMATION

AQUIFLOW^R Information System

Source: EDR proprietary database of groundwater flow information

EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit

Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Services

The U.S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

SSURGO: Soil Survey Geographic Database

Source: Department of Agriculture, Natural Resources Conservation Services (NRCS)

Telephone: 800-672-5559

SSURGO is the most detailed level of mapping done by the Natural Resources Conservation Services, mapping scales generally range from 1:12,000 to 1:63,360. Field mapping methods using national standards are used to construct the soil maps in the Soil Survey Geographic (SSURGO) database. SSURGO digitizing duplicates the original soil survey maps. This level of mapping is designed for use by landowners, townships and county natural resource planning and management.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

LOCAL / REGIONAL WATER AGENCY RECORDS

FEDERAL WATER WELLS

PWS: Public Water Systems

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data

Source: EPA/Office of Drinking Water

Telephone: 202-564-3750

Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: USGS National Water Inventory System (NWIS)

This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on wells, springs, and other sources of groundwater.

STATE RECORDS

Water Well Data

Source: Department of Environmental Quality

Telephone: 517-335-9218

The data in this file was obtained from Wellogic, the Michigan Department of Environmental Quality Statewide Groundwater Database (SGWD). Wellogic contains approximately 425,000 water well records found within the State of Michigan, and although it represents the best available data, it cannot be considered a complete database of all the wells or well records in existence.

OTHER STATE DATABASE INFORMATION

Michigan Oil and Gas Wells

Source: Department of Environmental Quality

Telephone: 517-241-1528

Locations of oil and gas wells are compiled from permit records on file at the Geological Survey Division (GSD), Michigan Department of Natural Resources.

RADON

State Database: MI Radon

Source: Department of Environmental Quality

Telephone: 517-335-9551 Radon Test Results

Michigan Radon Test Results

Source: Department of Environmental Quality

Telephone: 517-335-8037

These results are from test kits distributed by the local health departments and used by

Michigan residents. There is no way of knowing whether the devices were used properly, whether there are duplicates (or repeat verification) test (i.e., more than one sample per home), etc.

Area Radon Information

Source: USGS

Telephone: 703-356-4020

The National Radon Database has been developed by the U.S. Environmental Protection Agency

(USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at

private sources such as universities and research institutions.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

EPA Radon Zones Source: EPA

Telephone: 703-356-4020

Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor

radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities

Source: Federal Aviation Administration, 800-457-6656

Epicenters: World earthquake epicenters, Richter 5 or greater

Source: Department of Commerce, National Oceanic and Atmospheric Administration

Earthquake Fault Lines: The fault lines displayed on EDR's Topographic map are digitized quaternary faultlines, prepared

in 1975 by the United State Geological Survey

STREET AND ADDRESS INFORMATION

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| ALL INFORMATIO | N MUST BE T | YPED OR PRI | NTED EX | CEPT FOR | WRITTEN | SIGNATURES | | |
|--|---|---|-------------------------------------|---------------------------------|--|--|---------------------------------|-----------------------------|
| Company Name or Organization (if applicable) ASTI Environmental | Company's P 8745 | Project/Reference | Number | | Date 4-30- | | | |
| Requester's First Name Carey | Requester's Last Name Kratz | | | Daytime 810-2 | Daytime Phone # (Include Area Code) 810-225-288 | | | |
| Address (Street and Number) 10448 Citation Drive, Suite 100 | | | | | Fax # (i 810-2 | nclude Area Code) 25-3800 | | |
| City Brighton | State M1 | | Zip Code 48116 | | E-mail: ckrati | z@asti-env.co | om | |
| Please indicate the county name of the mater and the last of the l | w listed below ost of fulfilling u may wish t g specific bo nal commen | ny request o narrow dow xes related to ts field. For a | n your re particula dditional | quest by or divisions program i | s. If you do | not see what i, please <u>click</u> h | you are look here. | ding for in the |
| Programs: If you are only requesting the avail appropriate form field(s) provided below. (see div | | ms in site table | | then pleas | se list the sit | e number (i.e., S | ite 1, 2, etc. o | |
| AQD - Permits | | 2, 4 | OWMR | P (RMG)- | Hazardous | Waste | | 1, 2, 3, 4 |
| RRD - BEA Only | | 2, 4 | OWMR | P (RMG)- | Solid Waste | | | |
| RRD - Environmental Remediation | | 2 | OOGM | OOGM - Oil, Gas and Minerals | | | | |
| RRD - Leaking Underground Storage Tanks (Pa | art 213) | 2 | WRD -0 | Groundwate | Br | | | |
| RRD -Superfund | | | WRD - Water Permits | | | | | |
| Storage Tanks (Part 211)- Jim Lucas – Lucasj@michigan.gov | | SUBMIT to DLARA | WRD - | WRD - Stormwater | | | RE L | |
| ODWMA (RMG)- Public Water Supply | | WRD - Wetlands | | | | | | |
| Provide a detailed description of materials being Facility Name, Street Address | ovide the sect on requested. At a | minimum, include | range for | | | | Resource Management (RMG) | Water Resources (WRD) |
| Site 1 Black River Mfg. Inc. 2625 20th Street, Port Huron, St. Clair MID083430843 | County | NO | | | | | × | |
| Site 2 Mascotech Accessories, St. Clai 1721 Dove Street, Port Huron, St. Clai MID096963913, 74000084, 00012081 4669 2243 9 4 7 // Cand Site 3 Wirtz Mfg. Co Inc. | ir County | 01 | 74 | x | | X | × | |
| 2654 20th Street, Port Huron, St. Clair | | - | No | | | | × | |
| Site 4 Mfg of Automotive Parts/Forme Systems/Huron St. Clair 2655 16th Str Huron, St. Clair County BEAs 5230, 47 | eet/Sixteen | th Street, Po | ort | × | | X | × | |

MID061861647
Sito 5
Additional Comments:

Carey Kratz

From: DEQFOIA [DEQFOIA@michigan.gov]
Sent: Tuesday, May 13, 2014 3:25 PM

To: Carey Kratz

Subject: Request for Disclosure of Official Files

Follow Up Flag: Follow up Flag Status: Flagged

Mr. Carey Kratz ASTI Environmental 10448 Citation Drive, Suite 100 Brighton, MI 48116

Dear Mr. Kratz:

SUBJECT: Request for Disclosure of Official Files - Office of Waste Management and Radiological Protection

This notice is issued in response to your request for information under the Freedom of Information Act, 1976 PA 442, as amended (FOIA), received on May 1, 2014. You have requested information that you describe as "2625, 2654 20th Street, Port Huron, 1721 Dove Street, Port Huron, 2655 16th Street, Port Huron" (FOIA 3641-14).

Your request is granted in part and denied in part.

As to the partial granting of your request, all existing, non-exempt records located in the Southeast Michigan District Office responsive to your description of records were made available for your review.

The requestor reviewed the following records on 05-13-14; no charge:

Black River Manufacturing, 2625 20th St., Port Huron, MI

Records do not exist for the remaining sites requested.

The purpose of the FOIA is to provide the public with access to existing, nonexempt public records of public bodies. Your request to examine or receive a copy of the documents described above is denied.

To the best of this public body's knowledge, information, and belief, the public record does not exist under the name given by the requester, or by another name reasonably known to the public body.

Under section 10 of the FOIA, the DEQ is obligated to inform you that you may due the following:

- 1) Appeal this decision in writing to the Director of the Department of Environmental Quality, P.O. Box 30473, Lansing, Michigan 48909-7973. The writing must specifically state the word "appeal," and must identify the reason or reasons you believe the denial should be reversed. The head of the department, or his designee, must respond to your appeal within 10 days of its receipt. Under unusual circumstances, the time for response to your appeal may be extended by 10 business days.
- 2) File an action in the appropriate court within 180 days after the date of the final determination to deny the request. If you prevail in such an action, the court is to award reasonable attorney fees, costs, and disbursements, and possible damages.

Susan Vorce, FOIA Coordinator Department of Environmental Quality 800-662-9278 degfoia@michigan.gov

Carey Kratz

From: Sent: DEQFOIA [DEQFOIA@michigan.gov] Thursday, May 01, 2014 1:55 PM

To:

Carey Kratz

Subject:

Request for Disclosure of Official Files

Follow Up Flag: Flag Status:

Follow up Flagged

Mr. Carey Kratz ASTI Environmental 10448 Citation Drive, Suite 100 Brighton, MI 48116

Dear Mr. Kratz:

SUBJECT: Request for Disclosure of Official Files - Remediation and Redevelopment Division

This notice is issued in response to your request for information under the Freedom of Information Act, 1976 PA 442, as amended (FOIA), received on May 1, 2014. You have requested information that you describe as "2626 and 2660 20th Street, Port Huron" (FOIA 3642-14).

The purpose of the FOIA is to provide the public with access to existing, nonexempt public records of public bodies. Your request to examine or receive a copy of the documents described above is denied.

To the best of this public body's knowledge, information, and belief, the public record does not exist under the name given by the requester, or by another name reasonably known to the public body.

Under section 10 of the FOIA, the DEQ is obligated to inform you that you may due the following:

- 1) Appeal this decision in writing to the Director of the Department of Environmental Quality, P.O. Box 30473, Lansing, Michigan 48909-7973. The writing must specifically state the word "appeal," and must identify the reason or reasons you believe the denial should be reversed. The head of the department, or his designee, must respond to your appeal within 10 days of its receipt. Under unusual circumstances, the time for response to your appeal may be extended by 10 business days.
- 2) File an action in the appropriate court within 180 days after the date of the final determination to deny the request. If you prevail in such an action, the court is to award reasonable attorney fees, costs, and disbursements, and possible damages.

Susan Vorce, FOIA Coordinator Department of Environmental Quality 800-662-9278 degfoia@michigan.gov

The DEQ strives to continually improve its customer service to FOIA requesters. To provide input for improvements to the FOIA process, please complete this survey: https://www.surveymonkey.com/s/foiaprocess

2655 16+4 ST.



Although the facility is located topographically down-gradient from the Site and estimated groundwater flow in the area of the Site is to the southeast and away from the Site, the listing has the potential to possibly to have affected subsurface conditions at the Site; therefore, Nova has made a FOIA request with the MDEQ to review the RRD files regarding the facility to determine whether any issues have arisen regarding listing on these databases. No file review information was made available within the timeframe of this report. Based on the documented contamination at this facility and proximity of the facility relative to the Site, this facility is considered a Recognized Environmental Condition in connection with the Site. Any potential offsite impacts originating from the 1721 Dove Street property to the south would be identified during the proposed Phase II investigations for both the subject property as well as the 1721 Dove street property.

3.2 Sanborn Fire Insurance Maps

Fire insurance maps were created for insurance underwriters and often contain information regarding the uses of individual structures, and the locations of fuel and/or chemical storage tanks which may have been on a particular property. Review of EDR's Sanborn fire insurance map collection indicated that no maps have been prepared for the Site area. A copy of the No Coverage Letter is included in Appendix B.

3.3 Aerial Photographs

Aerial photographs for the Site area were obtained from EDR. Photographs for the years 1938, 1941, 1949, 1956, 1964, 1970, 1980, 1985, 1992, 2000, and 2005 were reviewed for this ESA. Copies of the 1938, 1941, 1949, 1956, 1964, 1970, 1980, 1985, 1992, 2000, and 2005 photographs are included in Appendix B.

3.3.1 Past Site Uses

| YEAR(S) | USE |
|---------|--|
| 1938 | Undeveloped land |
| 1941 | Undeveloped land |
| 1949 | Undeveloped land |
| 1956 | Undeveloped land with some cleared area |
| 1964 | Undeveloped land with some cleared area |
| 1970 | The site has been developed with the eastern portion of the shop area of the current structure with current parking and service areas to the north. No obvious evidence of recognized environmenta conditions observed. |
| 1980 | East and west shop area and office portion of the current building structure in their current configuration with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |
| 1985 | East and west shop area and office portion of the current building structure in their current configuration with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |
| 1992 | Current building structure in its current configuration with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |



| YEAR(S) | USE |
|---------|--|
| 2000 | Current building structure in its current configuration with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |
| 2005 | Current building structure in its current configuration with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |

No previous uses indicative of obvious environmentally suspect practices or activities were identified on the Site based on this review of historical aerial photographs.

3.3.2 Past Adjacent Property Uses

| | 1938 | | | |
|-----------|------------------|--|--|--|
| Direction | Use | | | |
| North | Undeveloped land | | | |
| East | Undeveloped land | | | |
| South | Undeveloped land | | | |
| West | Undeveloped land | | | |

| | 1941 | | | | |
|-----------|------------------|--|--|--|--|
| Direction | Use | | | | |
| North | Undeveloped land | | | | |
| East | Undeveloped land | | | | |
| South | Undeveloped land | | | | |
| West | Undeveloped land | | | | |

| | 1949 | | | | |
|-----------|------------------|--|--|--|--|
| Direction | Use | | | | |
| North | Undeveloped land | | | | |
| East | Undeveloped land | | | | |
| South | Undeveloped land | | | | |
| West | Undeveloped land | | | | |

| | 1956 | | | |
|-----------|------------------|--|--|--|
| Direction | Use | | | |
| North | Undeveloped land | | | |
| East | Undeveloped land | | | |
| South | Undeveloped land | | | |
| West | Undeveloped land | | | |

| 1964 | | |
|-----------|------------------|--|
| Direction | Use | |
| North | Undeveloped land | |
| East | Undeveloped land | |
| South | Undeveloped land | |
| West | Undeveloped land | |



| 1970 | | |
|--|---|--|
| Direction | Use | |
| North | Undeveloped land. No obvious evidence of recognized environmental conditions observed. | |
| East | Undeveloped land. No obvious evidence of recognized environmental conditions observed. | |
| The current industrial buildings. No obvious evidence of recognized environm observed. | | |
| West | The current warehouse buildings. No obvious evidence of recognized environmental conditions observed. | |

| 1980 | | |
|-----------|---|--|
| Direction | Use | |
| North | Vacant land. No obvious evidence of recognized environmental conditions observed. | |
| East | The current park. No obvious evidence of recognized environmental conditions observed. | |
| South | The current industrial buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. | |
| West | The current warehouse buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. | |

| 1985 | | |
|--|--|--|
| Direction | Use | |
| North | Vacant land. No obvious evidence of recognized environmental conditions observed. | |
| East | The current park. No obvious evidence of recognized environmental conditions observed. | |
| The current industrial buildings in their current configuration. No obvious evidence of environmental conditions observed. | | |
| West | The current warehouse buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. | |

| 1992 | | |
|-----------|--|--|
| Direction | Use | |
| North | Vacant land. No obvious evidence of recognized environmental conditions observed. | |
| East | The current park. No obvious evidence of recognized environmental conditions observed. | |
| South | The current industrial buildings in their current configuration. No obvious evidence of recognize environmental conditions observed. | |
| West | The current warehouse buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. | |

| 2000 | | |
|-----------|--|--|
| Direction | Use | |
| North | The current industrial building in its current configuration. No obvious evidence of recognized environmental conditions observed. | |
| East | The current park. No obvious evidence of recognized environmental conditions observed. | |
| South | The current industrial buildings in their current configuration. No obvious evidence of recognize environmental conditions observed. | |
| West | The current warehouse buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. | |



| 2005 | | |
|-----------|---|--|
| Direction | Use | |
| North | The current industrial building in its current configuration. No obvious evidence of recognized environmental conditions observed. | |
| East | The current park. No obvious evidence of recognized environmental conditions observed. | |
| South | The current industrial buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. | |
| West | The current warehouse buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. | |

The south adjacent property has been identified as an REC in connection with the Site.

3.4 City Directories

City directories provide listings, arranged by street address, of facilities for the year the directory was published. Port Huron City Directories and Port Huron/St. Clair County Donnelly Directories were reviewed at the St. Clair District Library for the years of 1938, 1946, 1953, 1957, 1963, 1968, 1974, 1980, 1986, 1992, and 2004. A summary of information reviewed is included in the following tables. Copies of the city directory information are included as Appendix D.

| YEAR(S) | PAST SITE USES | |
|---------|---|--|
| 1938 | No Listing | |
| 1946 | No Listing | |
| 1953 | No Listing | |
| 1957 | lo Listing | |
| 1963 | lo Listing | |
| 1968 | No Listing | |
| 1974 | Huron St Clair (Div. of Masco) – 2655 16 th Street | |
| 1980 | Huron St Clair (Div. of Masco) – 2655 16 th Street | |
| 1986 | St Clair Metal Products – 2655 16 th Street | |
| 1992 | Huron St Clair (Div. of Masco) – 2655 16 th Street | |
| 1998 | Sport Rack Automotive – 2655 16 th Street | |
| 2004 | Sport Rack Accessories – 2655 16 th Street | |

Overall, historic uses identified in listings of the Site do not show obvious listings that would be expected to have resulted in current impacts to the Site.

| SURROUNDING PROPERT | Y USES IN 1938 | |
|-----------------------|----------------|--|
| Adjacent to the north | No Listing | |
| Adjacent to the east | No Listing | |
| Adjacent to the south | No Listing | |
| Adjacent to the west | No Listing | |



| SURROUNDING PROPERT | Y USES IN 1946 | |
|-----------------------|----------------|--|
| Adjacent to the north | No Listing | |
| Adjacent to the east | No Listing | |
| Adjacent to the south | No Listing | |
| Adjacent to the west | No Listing | |

| SURROUNDING PROPERT | / USES IN 1953 | |
|-----------------------|----------------|--|
| Adjacent to the north | No Listing | |
| Adjacent to the east | No Listing | |
| Adjacent to the south | No Listing | |
| Adjacent to the west | No Listing | |

| SURROUNDING PROPERT | Y USES IN 1957 | |
|-----------------------|----------------|--|
| Adjacent to the north | No Listing | |
| Adjacent to the east | No Listing | |
| Adjacent to the south | No Listing | |
| Adjacent to the west | No Listing | |

| SURROUNDING PROPERT | Y USES IN 1963 |
|-----------------------|--|
| Adjacent to the north | No Listing |
| Adjacent to the east | No Listing |
| Adjacent to the south | No Listing |
| Adjacent to the west | No Listing |
| SURROUNDING PROPERT | Y USES IN 1968 |
| Adjacent to the north | No listing |
| Adjacent to the east | No listing |
| Adjacent to the south | Lexington Molding Co. – 1631 Dove Street; Huron Manufacturing – 1723 Dove Street |
| Adjacent to the west | No listing |

| SURROUNDING PROPERT | Y USES IN 1974 |
|-----------------------|--|
| Adjacent to the north | No listing |
| Adjacent to the east | No listing |
| Adjacent to the south | Howard Automotive Products – 1631 Dove Street; St Clair Metal Products – 1721 Dove Street |
| Adjacent to the west | No listing |

| SURROUNDING PROPERT | Y USES IN 1980 |
|-----------------------|---|
| Adjacent to the north | No listing |
| Adjacent to the east | No listing |
| Adjacent to the south | Riverside Metal Products – 1631 Dove Street; Huron St Clair (Div. of Masco) – 1721 Dove Street |
| Adjacent to the west | No listing |



| SURROUNDING PROPERT | Y USES IN 1986 |
|-----------------------|---|
| Adjacent to the north | No listing |
| Adjacent to the east | No listing |
| Adjacent to the south | Riverside Metal Products – 1631 Dove Street; St Clair Metal Products – 1721 Dove Street |
| Adjacent to the west | No listing |

| SURROUNDING PROPERT | Y USES IN 1992 |
|-----------------------|--|
| Adjacent to the north | No listing |
| Adjacent to the east | No listing |
| Adjacent to the south | Riverside International – 1631 Dove Street; Huron St Clair (Div. of Masco) – 1721 Dove Street |
| Adjacent to the west | No listing |

| SURROUNDING PROPERT | TY USES IN 1998 | |
|-----------------------|---|--|
| Adjacent to the north | Black River Plastics – 2611 16 th Street | |
| Adjacent to the east | No listing | |
| Adjacent to the south | Crown Group – 1631 Dove Street; NP – 1721 Dove Street | |
| Adjacent to the west | No listing | |

| SURROUNDING PROPERT | Y USES IN 2004 |
|-----------------------|--|
| Adjacent to the north | Black River Plastics – 2611 16 th Street |
| Adjacent to the east | No listing |
| Adjacent to the south | Crown Group – 1631 Dove Street; Sport Rack Automotive – 1721 Dove Street |
| Adjacent to the west | No listing |

Based on all the historical and regulatory information, the property at 1721 Dove Street has the potential to impact conditions at the Site.

3.5 Local Agency Review

3.5.1 Port Huron Inspection Department

| CONTACT NAME SOURCE TYPE PHONE NUMBER | COMMENTS |
|---|---|
| FOIA Request Inspection Department 100 McMorran Boulevard Port Huron, Michigan 48060 810-984-9733 | Nova made a written Freedom of Information Act (FOIA) request for records from the Port Huron Inspection Department for the Site. A response to this request indicated no file information related to the current environmental condition of the Site. A copy of the request and associated response is included in Appendix F. |

3.0 PROPERTY DESCRIPTION AND INTENDED HAZARDOUS SUBSTANCE USE

The subject property is located in the SE quarter of Section 16, Town 6N, Range 17E, City of Port Huron, St. Clair County, Michigan. The subject property's address is 2655 16th Street, and the tax identification number is 06-182-0048-000. A legal property description is included as Attachment 1.

The subject property consists of 6.2 acres and contains a 108,550 sf single-story, slab-on-grade, steel-framed industrial building constructed in 1968.

The subject property is bordered on the north by the former Black River Plastics (currently vacant); on the east by 16th Street and the City of Port Huron 16th Street Park; on the south by the former Crown Group facility and the 1721 Dove Street former Advanced Accessory Systems; and on the west by Tapex American Corp and Wirtz manufacturing facilities.

The surface elevation of the subject property is approximately 605 ft amsl. The closest surface water body is the St. Clair River, which is located approximately 0.35 mile southeast of the subject property.

Photographs of important features at the subject property are included as Figure 3. These photographs were taken on January 3, 2011, by Ms. Sara M. Looney. The photographs are labeled with the date of the picture, name of the photographer, description of what the photograph illustrates, and location where the photograph was taken.

There are abandoned and discarded containers onsite from the previous operations. These containers are identified on the attached Form EQ4476, in accordance with Part 9 of the BEA Rules. NAI Farbman will comply with all applicable local, state, and federal laws for the disposal of these materials.

The future use of this property will be property held in receivership for future sale. Therefore, there will be no significant hazardous substance use on the subject property.

A BEA has not been previously conducted on this property.

4.0 KNOWN CONTAMINATION

A Phase I ESA Update for the subject property, in accordance with ASTM Standard 1527-05 and AAI, was completed in May 2010 by FTC&H. A copy of this Phase I ESA Update report is included as Attachment 2. The Phase I ESA Update identified the following RECs at the subject property:

- A. The historical use of the subject property by various manufacturing and industrial operations for more than 40 years, and the lack of information regarding the use and storage of hazardous substances, petroleum products, and hazardous waste.
- B. The subject property is a *facility* based on DRO in the site soils and dissolved lead, vinyl chloride, and DRO in the groundwater.
- C. The material threat of a release of petroleum products to soils beneath oil-stained, cracked concrete floors in several areas throughout the subject building

Based on the findings of the May 2010 Phase I ESA Update, a Phase II ESA was conducted to investigate subsurface conditions. The results of the Phase II ESA are included as Attachment 3 and are summarized below.

A Phase I ESA Update for the subject property, in accordance with ASTM Standard 1527-05 and AAI, was completed in January 2011 by FTC&H. The January 2011 Phase I ESA Update identified the following RECs for the subject property:

- A. The subject property is a facility based on TCE in the site soils.
- B. The material threat of a release of petroleum products to soils beneath oil-stained, cracked concrete floors in several areas throughout the subject building.

Based on the January 2011 Phase I ESA Update, additional Phase II investigative activities were not recommended.

4.1 SOIL CONTAMINATION

In April 2010, three test borings were completed at the subject property to evaluate the RECs identified in the FTC&H May 2010 Phase I ESA Update. Soil samples were collected at each boring location and analyzed for VOCs, PNAs, and the Michigan 10 Metals.

Soil boring/temporary well (SB/TW) <u>SB/TW-1</u> was installed near stained concrete located in the southeastern portion of the building. No soil staining or PID response was observed. A soil sample was collected at 1 to 2 ft bgs. Total chromium and mercury were detected in the soil sample exceeding one of the Part 201 GRCC, but below their respective SDBLs. Benzene and numerous metals were detected in the soil sample at concentrations below Part 201 GRCC, while the remaining tested parameters (VOCs and PNAs) were not detected above their respective laboratory reporting limits.

SB/TW-2 was installed near stained concrete, located in the northeastern portion of the building. No soil staining or PID response was observed in any of the soils. Duplicate soil and groundwater samples were collected at this location. A soil sample was collected from below the concrete at 1 to 3 ft bgs. Numerous metals were detected in both the investigative and duplicate soil samples at concentrations below Part 201 GRCC, while the remaining tested parameters (VOCs and PNAs) were not detected above their respective laboratory reporting limits.

SB/TW-3 was installed near oil-stained concrete floors, south of the shop area, located in the northwest portion of the building. During the site reconnaissance, two ASTs, a 55-gallon drum, and two 5-gallon buckets of hydraulic fluid were observed in the shop area. A 2-inch-thick black sand layer that contained some organic material was encountered at approximately 2 ft bgs. No soil staining or PID response was observed. A soil sample was collected from 1.5 to 2.5 ft bgs, corresponding to the depth of the black sand layer. TCE was detected in the soil sample at concentrations exceeding applicable Part 201 GRCC. Cis-1,2-dichloroethylene, tetrachloroethylene, and numerous metals were detected in the soil sample at concentrations below Part 201 GRCC.

None of the tested compounds were detected in the trip blank and field blank samples in concentrations exceeding laboratory reporting limits.

This parcel meets the definition of a *facility*, as defined in the NREPA, due to the presence of TCE in the soil at concentrations exceeding Part 201 GRCC.

4.2 GROUNDWATER CONTAMINATION

Three temporary monitoring wells were installed at the subject property to evaluate the RECs identified in the May 2010 Phase I ESA Update. Groundwater samples were collected from each temporary monitoring well and analyzed for VOCs, PNAs, and the Michigan 10 meTals.

Groundwater was encountered in **SB/TW-1** at approximately 4.3 ft bgs, and a temporary well was installed (screened from 5 to 10 ft bgs). Total arsenic and barium were detected in the groundwater sample at concentrations below Part 201 GRCC. The remaining tested parameters were not detected above laboratory reporting limits in the groundwater sample collected.

Groundwater was encountered in **SB/TW-2** at approximately 4.5 ft bgs, a temporary well was installed (screened from 5 to 10 ft bgs), and an investigative and a duplicate groundwater sample were collected. Total arsenic and barium were detected in both the investigative and duplicate groundwater samples at concentrations below Part 201 GRCC. The remaining tested parameters were not detected above laboratory reporting limits in the groundwater samples collected.

Groundwater was encountered in SB/TW-3 at approximately 3.8 ft bgs. A temporary well was installed (screened from 2.5 to 7.5 ft bgs), and a groundwater sample was collected. 1,1-dichloroethane, cis-1,2-dichloroethene, trans-1,2-dichloroethene, vinyl chloride, total arsenic, barium, and copper were detected in the groundwater sample at concentrations below Part 201 GRCC. The remaining tested parameters were not detected above laboratory reporting limits in the groundwater samples collected.

None of the tested parameters were detected in the groundwater samples at concentrations exceeding Part 201 GRCC. There is no known groundwater contamination at the subject property.

Soil and groundwater analytical results for the detected parameters are summarized on Tables 1 and 2, respectively, and compared to applicable MDNRE Part 201 GRCC.

Table 1 · Soil Analytical Results, Detected Parameters

Baseline Environmental Assessment

Former Advanced Accessory Systems, 16th Street, Port Huron, Michigan

| Sampling Location: | | SB-1 | SB-2 | SB-2 | SB-3 | FB | Statewide | Residential | Groundwater | Residential | Residential | |
|---|-----------|--------------------------------|--------------------------------|---|------------------------------------|---------------------------------------|----------------------------------|-------------------------------------|---|---|---|--|
| Sample Depth: Comment: Collection Date: Laboratory Number: | | 1-2' 04/14/10 1004244-01 | 1-3' 04/14/10 1004244-02 | 1-3' Duplicate 04/14/10 1004244-03 | 1.5-2.5' 04/14/10 1004244-04 | Field Blank 04/14/10 1004244-05 | Default Background Levels* | Drinking Water Protection Criteria* | Surface Water Interface Protection Criteria* | Infinite Source Volatile Soil Inhalation Criteria* | Particulate Soil Inhalation Criteria* | Residential Direc Contact Criteria* |
| Volatile Organic Compounds (VOCs) | CAS No. | | | | | | | | | | | |
| Benzene | 71-43-2 | 61 | 62 U | 60 U | 64 U | 50 U | NA | 100 | 4,000 (X) | 13,000 | 380,000,000 | 180,000 |
| cis-1,2-Dichloroethene | 156-59-2 | 61 U | 62 U | 60 U | 96 | 50 U | NA | 1,400 | 12,000 | 180,000 | 2.3E+09 | 640,000 (C) |
| Tetrachloroethene | 127-18-4 | 61 U | 62 U | 60 U | 67 | 50 U | NA | 100 | 900 (X) | 180,000 | 5.4E+09 | 88,000 (C) |
| Trichloroethene | 79-01-6 | 61 U | 62 U | 60 U | 160 | 50 U | NA | 100 | 4,000 (X) | 78,000 | 1.8E+09 | 500,000 (C,DD) |
| Metals | CAS No. | | | | | | | | | | | |
| Arsenic, Total (B) | 7440-38-2 | 3,200 | 380 | 390 | 1,100 | ren mi | 5,800 | 4,600 | 70,000 (X) | NLV | 720,000 | 7,600 |
| Barium, Total (B) | 7440-39-3 | 43,000 | 9,000 | 12,000 | 13,000 | - | 75,000 | 1,300,000 | 440,000 (G,X) | NLV | 330,000,000 | 37,000,000 |
| Cadmium, Total (B) | 7440-43-9 | 240 | 50 U | 50 U | 79 | | 1,200 | 6,000 | 3,600 (G,X) | NLV | 1,700,000 | 550,000 |
| Chromium, Total (B,H) | 7440-47-3 | 9,100 | 2,600 | 2,400 | 2,200 | | 18,000 (total) | 30,000 | 3,300 | NLV | 260,000 | 2,500,000 |
| Copper, Total (B) | 7440-50-8 | 14,000 | 530 | 430 | 4,900 | 44 | 32,000 | 5,800,000 | 75,000 (G) | NLV | 130,000,000 | 20,000,000 |
| Lead, Total (B) | 7439-92-1 | 49,000 | 2,300 | 2,100 | 7,700 | | 21,000 | 700,000 | 2,800,000 (G,X) | NLV | 100,000,000 | 400,000 |
| Mercury, Total (B) | 7439-97-6 | 51 | 50 U | 50 U | 46 U | i i | 130 | 1,700 | 50 (M); 1.2 | 52,000 | 20,000,000 | 160,000 |
| Selenium, Total (B) | 7782-49-2 | 330 | 200 U | 200 U | 200 U | | 410 | 4,000 | 400 | NLV | 130,000,000 | 2,600,000 |
| Silver, Total (B) | 7440-22-4 | 63 | 50 U | 50 U | 50 U | | 1,000 | 4,500 | 100 (M); 27 | NLV | 6,700,000 | 2,500,000 |
| Zinc, Total (B) | 7440-66-6 | 47,000 | 4,400 | 4,000 | 11,000 | 12 24 | 47,000 | 2,400,000 | 170,000 (G) | NLV | ID | 170,000,000 |
| Other | CAS No. | | | | | | | | | | | |
| Percent Solids (%) | NA | 90 | 87 | 89 | 87 | 9 - 9 - 10 | NA | NA | NA | NA | NA | NA |

Part 201 Residential & Commercial I Generic Cleanup Criteria, RRD Op Memo No. 1; January 23, 2006.

Values in micrograms per kilogram (µg/kg), unless otherwise noted.

Bolded values exceed one or more of the criterion.

CAS No. Chemical Abstract Service Number

Data Qualifiers:

U - Not detected above the given limit.

Footnotes:

- (B) Background, as defined in R 299.5701 (b), may be substituted if higher than the calculated cleanup criterion.
- (C) Value presented is a screening level based on the chemical-specific generic soil saturation concentration (Csat) since the calculated risk-based criterion is greater than Csat.
- (G) Calculated value using hardness of 150 mg/L, assuming SW not protected for DW use.
- (H) If analytical data are provided for total chromium only, they shall be compared to the cleanup criteria for Cr VI.
- (M) Calculated criterion is below the analytical target detection limit, therefore, the criterion defaults to the target detection limit (first number listed).
- (X) Value assumes SW not protected for DW use.
- (DD) Hazardous substance causes developmental effects. Residential and commercial I direct contact criteria are protective of both prenatal and postnatal exposure.
- D Insufficient data to develop criterion.
- NA Not available/not applicable.
- NLV Not likely to volatilize under most soil conditions.

Table 2 · Groundwater Analytical Results, Detected Parameters

Baseline Environmental Assessment

Former Advanced Accessory Systems, 16th Street, Port Huron, Michigan

| Sampling Location: Comment: Collection Date: Laboratory Numbers: | | TW-1 04/14/10 1004244-06 1004245-01 | TW-2 04/14/10 1004244-07 1004245-02 | TW-2 Duplicate 04/14/10 1004244-08 1004245-03 | TW-3 04/14/10 1004244-09 1004245-04 | TB 04/14/10 1004244-10 | Residential Drinking Water Criteria* | Groundwater Surface Water Interface Criteria* | Residential Groundwater Volatilization to Indoor Air Inhalation Criteria* | Groundwater Contact Criteria* | Acute Inhalation Screening Level* |
|--|-----------|--|--|---|--|---|--|--|--|-------------------------------------|---|
| Volatile Organic | | | | | | — + · · · · · · · · · · · · · · · · · · | | | | | |
| Compounds (VOCs) | CAS No. | | | | | | | | | | |
| 1,1-Dichloroethane | 75-34-3 | 1 U | 1 U | 1 U | 1.6 | 1 U | 880 | 740 | 1,000,000 | 2,400,000 | ID |
| cis-1,2-Dichloroethene | 156-59-2 | 1 U | 1 U | 1 U | 15 | 1 U | 70 (A) | 620 | 93,000 | 200,000 | ID |
| trans-1,2-Dichloroethene | 156-60-5 | 1 U | 1 U | 1 U | 1.2 | 1 U | 100 (A) | 1,500 | 85,000 | 220,000 | ID |
| Vinyl Chloride | 75-01-4 | 1 U | 1 U | 1 U | 1.1 | 1 U | 2.0 (A) | 15 | 1,100 | 1,000 | ID |
| Metals | CAS No. | | | | | | 2.0 (7.) | 10 | 1,100 | 1,000 | ID |
| Arsenic, Total | 7440-38-2 | 2.5 | 2.3 | 2.1 | 1.9 | | 10 (A) | 150 (X) | NLV | 4,300 | ID |
| Barium, Total | 7440-39-3 | 38 | 21 | 22 | 140 | 4 | 2,000 (A) | 670 (G,X) | NLV | 14,000,000 | ID |
| Copper, Total | 7440-50-8 | 1 U | 1 U | 1 U | 1.4 J | | 1,000 (E) | 13 (G) | NLV | 7,400,000 | ID |

^{*} Part 201 Residential & Commercial I Generic Cleanup Criteria, RRD Op Memo No. 1; January 23, 2006.

Values in micrograms per liter (µg/L).

Bolded values exceed one or more of the criterion.

CAS No. Chemical Abstract Service Number

Data Qualifiers:

- U Not detected above the given limit.
- J Estimated value

Footnotes:

- (A) Criterion is the state of Michigan drinking water standard established pursuant to Section 5 of 1976 PA 399, MCL 325.1005.
- (E) Criterion is the aesthetic drinking water value.
- (G) Calculated value using hardness of 150 mg/L, assuming SW not protected for DW use.
- (X) Value assumes SW not protected for DW use.
- ID Insufficient data to develop criterion.
- NLV Hazardous substance is not likely to volatilize under most conditions.

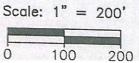
SOIL BORING/TEMPORARY WELL LOCATION

NOTE: ALL LOCATIONS ARE APPROXIMATE.

REFERENCE: PORT HURON NW, MI 1:12,000 ORTHOPHOTOMAP

US NAME VIOUSON VANSIER VAERIAL - 10 IN. IN





3.1 Geology and Site Conditions

Soil boring logs with descriptions of the encountered materials and water level information are contained in Appendix A. The depths that are shown as changes may be transitional, and the depths of the transitions may vary horizontally.

In general, the soil encountered at the Site consisted of approximately less than a foot of sand and gravel underlain by sand with some silt to the termination of the borings (up to 8 feet bg). Groundwater was encountered from approximately 4 feet bg to 6 feet bg.

3.2 Field Screening

Field screening of the soil samples collected from the test borings did not detect elevated concentrations of organic vapors when screened with a PID and unusual staining was not observed at the boring locations with the exception of test boring GP-6. Petroleum-like odors were observed in the soil samples collected at test borings GP-6.

3.3 Chemical Analyses

Chemical analysis of the soil samples collected from test borings did not detect concentrations of metals, VOCs, or SVOCs above the Michigan Department of Environmental Quality (MDEQ) Tier I Industrial and Commercial II, III, and IV Drinking Water Protection Criteria and Risk Based Screening Levels (RBSLs). Concentrations of GRO were reported below the laboratory method detection limits (MDLs) with the single exception of 6.8 mg/kg in GP-6 (3'-5'). Concentrations of DRO ranged from below MDLs (GP-7, GP-11 and GP-12) to 32,000 milligrams-per-kilogram (mg/kg) at GP-6. There is not a RBSL for DRO or GRO. Soil chemical analysis results are summarized in Table 1. The laboratory report is presented in Appendix B and a copy of the RBSLs for soil and groundwater are included in Appendix C.

Chemical analysis of the groundwater samples collected from the permanent monitoring wells and temporary wells at the test boring locations detected concentrations of dissolved metals that exceeded the RBSLs. The groundwater sample collected at monitoring well MW-A had reported concentrations of arsenic (17 micrograms per liter (ug/l)) and lead (15 ug/l) that exceeded the RBSLs of 10 and 4 ug/l, respectively. The groundwater sample collected at MW-C had a reported chromium concentration (720 ug/l) that exceeded the RBSL (200 ug/l total chromium). The groundwater sample collected at monitoring well MW-F had reported lead concentrations (39 ug/l) that exceeded the RBSL. The groundwater sample collected at temporary well GP-1 had reported concentrations of arsenic (37 ug/l), cadmium (5.2 ug/l), chromium (410 ug/l), and lead (140 ug/l) that exceeded the RBSLs. The RBSL for cadmium is 5 ug/l. The groundwater sample collected at temporary well GP-2 had reported arsenic (37 ug/l) and lead concentrations (30 ug/l) that exceeded their RBSLs. The groundwater sample collected at temporary well GP-9 had

lead that exceeded the RBSL. Groundwater chemical analysis results are summarized in Table 2.

Concentrations of GRO were reported below the MDLs with the exception of relatively low detections for groundwater samples collected at temporary wells GP-2 [14 ug/l] and GP-3 [17 ug/l]. Concentrations of DRO were reported for all the groundwater samples analyzed with the exception of the sample collected from temporary well GP-7. Concentrations of DRO ranged from 57 ug/l [GP-11] to 3,700 ug/l [GP-6]. There is not a RBSL for GRO or DRO.

Chemical analysis of VOCs indicated that the concentrations in groundwater were below their respective RBSLs with the exception of vinyl chloride. Concentrations of vinyl chloride exceeded the RBSL (2 ug/l) in groundwater samples that were collected at permanent monitoring wells MW-B, MW-C, MW-D and MW-E and at temporary well GP-10. The vinyl chloride exceedances ranged from 2.3 ug/l (MW-B) to 9.3 ug/l (MW-D).

Chemical analysis of SVOCs indicated that the concentrations in groundwater were below their respective MDLs with the exception the groundwater sample collected at temporary well GP-8. A concentration of 2,4-dinitrophenol (1.4 ug/l) was detected in the groundwater sample collected from GP-8. There is not a RBSL for 2,4-dinitrophenol.

In general, the soil encountered at the Site consisted of approximately less than a foot of sand and gravel underlain by sand with some silt to the termination of the borings (up to 8 feet bg). Groundwater was encountered at depths ranging from approximately 4 feet bg to 6 feet bg.

Field screening of the soil samples collected from the test borings did not detect elevated concentrations of organic vapors when screened with a PID and unusual staining was not observed at the boring locations with the exception of test boring GP-6. Petroleum-like odors were observed in the soil samples collected at test borings GP-6.

Chemical analysis of the soil samples collected from test borings did not detect concentrations of metals, VOCs, or SVOCs above the RBSLs. Concentrations of GRO were reported below the laboratory method detection limits (MDLs) with the single exception of 6.8 mg/kg in GP-6 (3'-5'). Concentrations of DRO ranged from below MDLs (GP-7, GP-11 and GP-12) to 32,000 mg/kg at GP-6. There is not a RBSL for DRO or GRO. At Nova's request, ESC analyzed the chromatogram for the elevated detection of DRO (32,000 mg/kg) for the soil sample collected at GP-6. ESC indicated that the chromatogram was indicative of light oil. GP-6 was advanced next to the area of floor that was saturated with hydraulic oil.

Chemical analysis of the groundwater samples collected from the permanent monitoring wells and temporary wells at the test boring locations detected concentrations of dissolved metals and vinyl chloride that exceeded the RBSLs. Chemical analysis of SVOCs indicated that the concentrations in groundwater were below their respective RBSLs.

Concentrations of GRO were reported below the MDLs with the exception of relatively low detections for groundwater samples collected at temporary wells GP-2 and GP-3. Concentrations of DRO were reported for all the groundwater samples analyzed with the exception of the sample collected from temporary well GP-7. Concentrations of DRO ranged from 57 ug/l (GP-11) to 3,700 ug/l (GP-6). At Nova's request, ESC analyzed the chromatograms for the elevated detections of DRO in groundwater samples collected at temporary wells GP-5, GP-6, GP-8, and GP-9. ESC indicated that the chromatograms were indicative of light oil with two individual compounds early in the chromatogram for GP-9 had the two individual compounds early in the chromatogram without very much of the light oil. There is not a RBSL for GRO or DRO.

Based on the groundwater RBSL exceedances for the dissolved metals and vinyl chloride concentrations along with the relatively high DRO concentrations observed at the Site, Nova recommends providing the results of this investigation to the MDEQ to determine if additional investigation is warranted.

The protective casings for several of the flush grade monitoring wells were observed to be in poor condition. Nova recommends that the groundwater monitoring wells at the Site be considered for abandonment from a licensed driller. However, the well abandonments should be completed after the DEQ determines that no further investigation is warranted.

TABLE 2

SUMMARY OF GROUNDWATER ANALYTICAL RESULTS

Former Advanced Accessory Systems
Port Huron, Michigan
Nova Project No. F09-1842
Samples Collected on 10/7/2009

| Groundwater | MW-A | MW-B | MW-C | MW-D | MW-E | MW-F | GP-1 | GP-2 | GP-3 | *Tier I Industrial RBSLs |
|----------------------------|--------|--------|---------|--------|--------|--------|--------|--------|--------|--------------------------|
| Parameter | (ug/l) | (ug/l) | (ug/l) | (ug/l) | (ug/l) | (ug/l) | (ug/l) | (ug/l) | (ug/l) | (ug/l) |
| RCRA Metals | | | | | | | | | | |
| Arsenic | 17 | NS | 5.2 | NS | NS | 8.4 | 37 | 37 | NS | 10 |
| Barium | 140 | NS | 67 | NS | NS | 240 | 1,900 | 220 | NS | 2,000 |
| Cadmium | 0.68 | NS | <0.16 | NS | NS | 1.2 | 5.2 | 3.7 | NS | 5 |
| Chromium | 18 | NS | 720 | NS | NS | 39 | 410 | 23 | NS | 200 (total chromium) |
| Copper | 40 | NS | 7.6 | NS | NS | 49 | 190 | 45 | NS | 1,000 |
| Lead | 15 | NS | 1,2 | NS | NS | 39 | 140 | 30 | NS | 4 |
| Mercury | <0.057 | NS | < 0.057 | NS | NS | <0.057 | 0.38 | <0.057 | NS | |
| Selenium | 4.5 | NS | 3,6 | NS | NS | 2.7 | 9.3 | 4.8 | NS | 50 |
| Silver | < 0.31 | NS | < 0.31 | NS | NS | <0.31 | < 0.31 | <0.31 | NS | 98 |
| Zinc | 620 | NS | 15 | NS | NS | 1,200 | 800 | 360 | NS | 5,000 |
| TPH-GRO | <8 | <8 | <8 | <8 | <3 | <8 | <8 | 14 | 17 | **NL |
| TPH-DRO | 78 | 220 | 44 | 180 | 350 | 110 | LR | 150 | 130 | **NL |
| VOCs | | | | | | | | | | |
| Acetone | ⋖8.9 | <8.9 | <8.9 | 40 | <8.9 | 24 | <8.9 | <8.9 | <8.9 | 2,100 |
| -Butanone (MEK) | <4.5 | <4.5 | <4.5 | <4.5 | <4.5 | <4.5 | <4.5 | <4.5 | <4.5 | 38,000 |
| ,1-Dichloroethane | 1.2 | 5.3 | 0.35 | 7.6 | 1.7 | < 0.31 | <0.31 | 12 | 7.8 | 2,500 |
| ,1-Dichloroethene | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | 0.65 | <0.5 | 7 |
| is-1,2-Dichloroethene | <0.38 | <0.38 | <0.38 | 0.97 | 8.3 | <0.38 | <0.38 | 4.6 | 2 | 70 |
| rans-1,2-Dichloroethene | <0.3 | < 0.3 | <0,3 | <0.3 | < 0.3 | <0.3 | <0.3 | <0.3 | <0.3 | 100 |
| Methylene Chloride | | 1.1 | <0.3 | <0.3 | 0.83 | 1.1 | 1.1 | <0.3 | 0.96 | 5 |
| -Methyl-2-pentanone (MIBK) | <1.4 | <1.4 | <1.4 | <1.4 | <1.4 | <1.4 | <1.4 | <1.4 | <1.4 | 5,200 |
| -Methylnaphthalene | < 0.52 | <0.52 | <0.52 | <0,52 | <0.52 | <0.52 | 0.62 | <0.52 | <0.52 | NL |
| -Methylnaphthalene | < 0.43 | < 0.43 | <0.43 | <0.43 | <0.43 | < 0.43 | 0.53 | < 0.43 | <0.43 | 750 |
| etrachloroethene (PCE) | <0.29 | <0.29 | <0.29 | <0.29 | <0.29 | <0.29 | < 0.29 | <0.29 | <0.29 | 5 |
| oluene | <0.27 | <0.27 | <0.27 | <0.27 | <0.27 | <0.27 | <0.27 | < 0.27 | 0.4 | 790 |
| richloroethene (TCE) | < 0.37 | <0.37 | <0.37 | <0.37 | <0.37 | < 0.37 | <0.37 | 0.92 | <0.37 | 5 |
| ,1,1-Trichloroethane | <0.27 | <0.27 | <0.27 | <0.27 | <0,27 | <0.27 | <0.27 | <0.27 | 13 | 200 |
| ,2,4-Trimethylbenzene | <0.2 | <0.2 | <0.2 | <0.2 | <0.2 | <0.2 | <0.2 | <0.2 | <0.2 | 63 |
| inyl Chloride | < 0.27 | 2.3 | 6.5 | 9.3 | 5.8 | <0.27 | <0.27 | 1.6 | <0.27 | 2 |
| SVOCs | | | | | | | | | | |
| ,4-Dinitrophenol | <1.2 | NS | <1.2 | NS | NS | <1.2 | LR | <1.2 | NS | NL |

Notes: (use less than symbols to show detection limits)

Concentrations reported in micrograms-per-liter (ug/l) or parts-per-billion.

< = Less than laboratory method detection limit

Concentrations in bold are at or above stated RBSL.

NL = Parameter not listed.

VOC = volatile organic compound

^{*-}Tier I Industrial and Commercial II, Ill, & IV Drinking Water Criteria Risk Based Screening Levels (RBSLs).

TABLE 2 (Continued) SUMMARY OF GROUNDWATER ANALYTICAL RESULTS

Former Advanced Accessory Systems Port Huron, Michigan Nova Project No. F09-1842 Samples Collected on 10/7/2009

| Parameter RCRA Metals Arsenic Barium Cadmium Chromium Copper Lead Mercury Sclenium Silver Zinc TPH-GRO TPH-DRO | NS NS NS NS NS NS NS NS NS NS NS NS NS N | NS NS NS NS NS NS NS NS NS NS NS NS NS N | (ug/l) 2.9 290 <0.16 2.5 <0.52 <0.24 <0.057 2.2 <0.31 <6.8 | NS NS NS NS NS NS NS NS NS NS NS NS NS N | GP-8 (ug/l) 6.4 46 <0.16 7.9 17 3.7 <0.057 2.1 | GP-9 (ug/l) 14 15 <0.16 5.9 8.1 7.6 | 72 160 <0.16 11 8.7 6.6 <0.057 | NS NS NS NS NS NS | NS NS NS NS NS | 10 2,000 5 200 (total chromium) |
|--|--|--|--|--|---|--|--|----------------------|--|--|
| Arsenic Barium Cadmium Chromium Copper Lead Mercury Selenium Silver Zinc TPH-GRO TPH-DRO | NS NS NS NS NS NS NS NS NS NS NS NS NS N | NS NS NS NS NS NS NS NS NS NS NS NS NS | 2.9 290 <0.16 2.5 <0.52 <0.24 <0.057 2.2 <0.31 | NS NS NS NS NS NS NS NS NS NS | 6.4 46 <0.16 7.9 17 3.7 <0.057 | 14 15 <0.16 5.9 8.1 7.6 | 72 160 <0.16 11 8.7 6.6 | NS NS NS NS | NS NS NS NS NS | 10 2,000 5 200 (total chromium) |
| Barium Cadmium Chromium Copper Lead Mercury Selenium Silver Zinc TPH-GRO TPH-DRO | NS NS NS NS NS NS NS NS NS NS NS NS NS N | NS NS NS NS NS NS NS NS NS NS NS NS NS | 290 <0.16 2.5 <0.52 <0.24 <0.057 2.2 <0.31 | NS NS NS NS NS NS | 46 <0.16 7.9 17 3.7 <0.057 | 15 <0.16 5.9 8.1 7.6 | 160 <0.16 11 8.7 6.6 | NS NS NS | NS NS NS | 2,000 5 200 (total chromium) |
| Cadmium Chromium Copper Lead Mercury Selenium Silver Zinc TPH-GRO TPH-DRO | NS NS NS NS NS NS NS NS NS NS NS | NS NS NS NS NS NS NS NS NS NS | 290 <0.16 2.5 <0.52 <0.24 <0.057 2.2 <0.31 | NS NS NS NS NS NS | 46 <0.16 7.9 17 3.7 <0.057 | 15 <0.16 5.9 8.1 7.6 | 160 <0.16 11 8.7 6.6 | NS NS NS | NS NS NS | 2,000 5 200 (total chromium) |
| Chromium Copper Lead Mercury Selenium Silver Zinc TPH-GRO TPH-DRO | NS NS NS NS NS NS NS NS NS | NS NS NS NS NS NS NS NS NS | <0.16 2.5 <0.52 <0.24 <0.057 2.2 <0.31 | NS NS NS NS NS | <0.16 7.9 17 3.7 <0.057 | <0.16 5.9 8.1 7.6 | <0.16 11 8.7 6.6 | NS NS NS | NS NS NS | 5 200 (total chromium) |
| Copper Lead Mercury Selentum Silver Zinc TPH-GRO TPH-DRO | NS NS NS NS NS NS NS | NS NS NS NS NS NS NS NS NS | 2.5 <0.52 <0.24 <0.057 2.2 <0.31 | NS NS NS NS | 7.9 17 3.7 <0.057 | 5.9 8.1 7.6 | 8.7 6.6 | NS NS | NS NS | |
| Lead Mercury Selentum Silver Zinc TPH-GRO TPH-DRO | NS NS NS NS NS NS NS | NS NS NS NS NS NS | <0.52 <0.24 <0.057 2.2 <0.31 | NS NS NS | 3.7 <0.057 | 8.1 7.6 | 8.7 6.6 | NS | NS | |
| Mercury Selenium Silver Zinc TPH-GRO TPH-DRO | NS NS NS NS NS | NS NS NS NS NS | <0.24 <0.057 2.2 <0.31 | NS NS NS | 3.7 | 7.6 | 6.6 | | The same of the sa | 1 000 |
| Selentum Silver Zinc TPH-GRO TPH-DRO | NS NS NS | NS NS NS NS | <0.057 2.2 <0.31 | NS NS | <0.057 | | | NS | | 1,000 |
| Silver Zinc TPH-GRO TPH-DRO | NS NS | NS NS NS | 2.2 <0.31 | NS | | 1 40.037 | | 210 | NS | 4 |
| Zinc TPH-GRO TPH-DRO | NS <=8 | NS NS | <0.31 | | | <0.38 | | NS | NS | 2 |
| TPH-GRO TPH-DRO | -28 | NS | | | <0.31 | <0.31 | 2.1 | NS | NS | 50 |
| TPH-DRO | | | | NS | 12 | | <0.31 | NS | NS | 98 |
| TPH-DRO | | - | | INO | 12 | 13 | 29 | NS | NS | 5,000 |
| | 110 | <8 | <8 | <8 | 48 | <8 | <8 | 48 | | |
| | | 2,600 | 3,700 | Q3 | 560 | 450 | 230 | 57 | <8 58 | ANL |
| | | | | | | 120 | 250 | 31 | 36 | MANL |
| VOCs | | | | | | | | | | |
| Acetone | <8.9 | 44 | <8.9 | <8.9 | <8.9 | <89 | <8.9 | <89 | <8.9 | 2,100 |
| -Butanone (MEK) | <4.5 | 8.6 | <4.5 | <4.5 | <4.5 | <4.5 | <4.5 | <4.5 | <4.5 | 38,000 |
| , I-Dichloroethane | 1.5 | 0.32 | <0.31 | <0.31 | <0.31 | <0.31 | 1.8 | <0.31 | <031 | 2,500 |
| ,I-Dichloroethene | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | <0.5 | 7 |
| is-1,2-Dichloroethene | <0.38 | <0.38 | 0.41 | <0.38 | <0.38 | 1.2 | 13 | <0.38 | <0.38 | 70 |
| rans-1,2-Dichloroethene | <0.3 | < 0.3 | <0.3 | <0.3 | < 0.3 | <0.3 | 0.94 | <03 | <0.3 | 100 |
| Aethylene Chloride | <0.3 | <0.3 | 0.82 | 0.79 | < 0.3 | 1 | 0.93 | <03 | 0.95 | 5 |
| -Methyl-2-pentanone (MIBK) | <1.4 | 2.1 | 3.4 | <14 | <1.4 | <1.4 | <14 | <14 | <14 | 5,200 |
| -Methylnaphthalene | <0.52 | <0.52 | < 0.52 | <0.52 | 0.84 | <0.52 | <0.52 | <0.52 | <0.52 | NL. |
| -Methylnaphthalene | < 0.43 | <0.43 | <0.43 | <0.43 | 0.58 | <0.43 | <0.43 | < 0.43 | <0.43 | 750 |
| etrachloroethene (PCE) | < 0.29 | < 0.29 | <0.29 | <0.29 | <0.29 | 1.2 | <0.29 | <0.29 | <0.29 | 5 |
| oluene | 0.42 | <0.27 | 0.39 | <0.27 | <0.27 | <0.27 | 0.44 | <0.27 | <0.27 | 790 |
| richloroethene (TCE) | < 0.37 | < 0.37 | < 0.37 | < 0.37 | < 0.37 | 0.97 | <0.37 | < 0.37 | < 0.37 | 5 |
| 1,1-Trichloroethane | 2 | < 0.27 | <0.27 | <0.27 | <0.27 | <0.27 | <0.27 | <0.27 | <0.27 | 200 |
| 2,4-Trimethylbenzene | <0.2 | <0.2 | <0.2 | <0.2 | <0.2 | <0.2 | 0.61 | <0.2 | <0.2 | 63 |
| inyl Chloride | <0.27 | <0.27 | <0.27 | <0.27 | <0.27 | <0.27 | 3,6 | <0.27 | <0.27 | 1 |
| SVOCs | | | | | | | | | | |
| 4-Dinitrophenol | NS | NS | <12 | NS | 1.4 | <1.2 | BB | NS | NS | NL |

Notes: (use less than symbols to show detection limits)

Concentrations reported in micrograms-per-liter (ug/l) or parts-per-billion.

Concentrations in **bold** are at or above stated RBSL.

TPH-GRO = Total Petroleum Hydrocarbons - gasoline range organics (C6-C10).

TPH-DRO = Total Petroleum Hydrocarbons - diesel range organies (high fraction).

NS = Parameter was not sampled.

LR = Surrogate recovery was too low and outside the acceptable range to report

NL = Parameter not fisted.

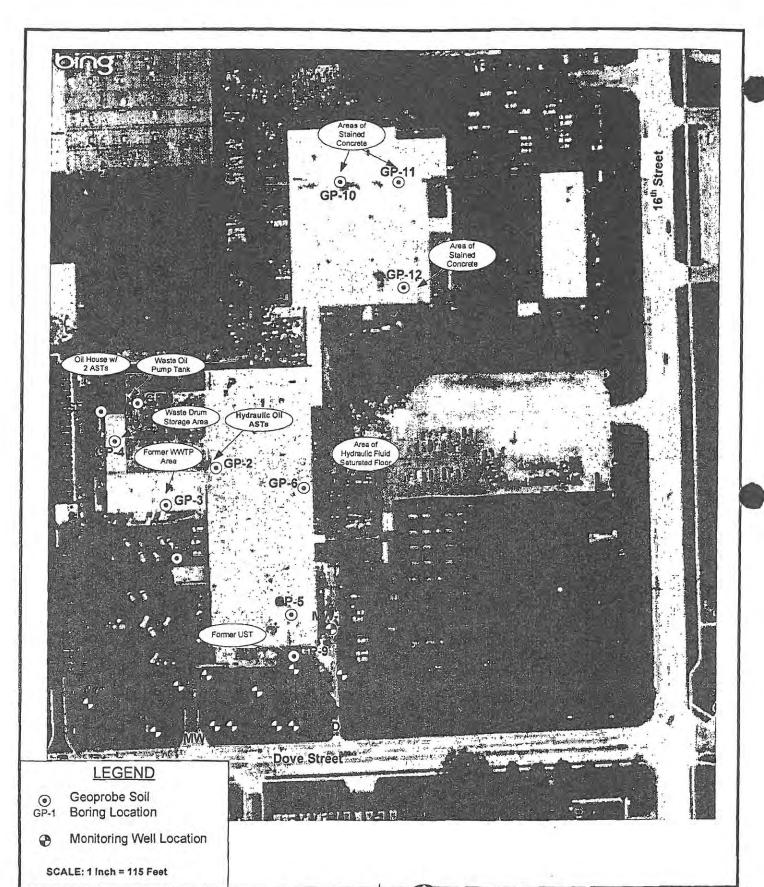
VOC = volatile organic compound

SVOC = Semi-volatile organic compound.

BB = Sample bortle broke in transport.

^{*-}Tier I Industrial and Commercial II, III, & IV Drinking Water Criteria Risk Based Screening Levels (RBSLs).

< = Less than laboratory method detection limit.



Soil Boring Locations Map Advanced Accessory Systems Dove Street and 16th Street Port Huron, Michigan



F09-1842



October 2009

Figure 2

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: SCHEDULED INVESTIGATION

A-LV-04459

| FACILITY: SPORTRACK | SRNB6247 | |
|-------------------------|---------------------------|--------------------|
| LOCATION: 1721 DOVE ST | DISTRICTLIVONIA | |
| CITY: PORT HURON | COUNTY: ST CLAIR CO | |
| CONTACT: LOREN MAXON | ACTIVITY DATE: 03/09/2001 | |
| REPORT DATE: 03/16/2001 | TRAVEL TIME: 3 HR | |
| LEVEL OF INSPECTION: 2 | TIME ON ACTIVITY 1 HR | |
| SOURCE CLASS: | []NSPS []NESHAP [| PSD []TOXIC []MACT |

REMARKS:

On 3/9/2001, Cyndi Mollenhour and I conducted an annual inspection at SportRack, formally known as Mascotech Accessories, which is located on 2655 16th St., Port Huron. The purpose of the inspection was to verify if the company had been operated in compliance with the air quality regulations and the permits. We arrived at the facility around 1:50 PM. Mr. Loren Maxon, the maintenance supervisor, met with us. I explained the purpose of the inspection.

Inspection:

The company manufactures sport racks and accessories. During the inspection, most of the processes were not in operation.

Permit #600-82A

This permit covers 2 plastic profile extrusion lines and a plastic co-extrusion line. The adhesive is only used in the plastic co-extrusion operation. Normally, only one extrusion line is operated per day. During the inspection, no lines were operated. The permit requires the company to keep a record of the adhesive usage; however, the company did not keep such a record. I requested the company to keep a monthly record starting on March. Mr. Maxon will send me the record at the beginning of April.

Permit # 569-92

The permit covers 4 glue applicators and 4 masker washers. However, 3 applicators have been removed, and only 2 masker washers are remaining at the site. In addition, sodium hydroxide is used in the masker washers instead of MEK; there is no air quality concern for the cleaning operation. Mr. Maxon estimated that a half-gallon of glue was consumed in a month. I told him

| STATUS CODES: | C=COMPLIANCE | NC=NONCOMPLIANCE | NO=NOT OPERATING | U=UNDETERMINED |
|---------------|--------------|------------------|------------------|------------------|
| NAME: | loye 35 | | DATE: 3/16/01 | SUPERVISOR: |
| <u> </u> | i | | | Page 1 (COMMUNIC |

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: SCHEDULED INVESTIGATION

A-LV-04459

FACILITY: SPORTRACK

SRNB6247

REMARKS:

that the glue operation would be exempted under Rule 290. He could void the permit and keep a record of the adhesive usage on a monthly basis and calculate the monthly VOC emission. I mailed the Rule 290 and record-keeping format to him after I came back to the office. During the inspection, the glue applicator was not in use.

Permit # 614-92

This permit covers 5 manual buffing and sanding machines. All of the machines have been removed. I advised him to void the permit.

In conclusion, the company did not keep an adequate record for the adhesive used in the co-extrusion line. They will start to keep a record since March of this year. Because the company uses a little adhesive, VOC emission from the facility is small.



ALL - CHEM CORPORATION

15120 THIRD AVE. HIGHLAND PARK, MI 48203 1-313-865-3604

EMERGENCY TELEPHONE NUMBER CHEMTREC - 1-800-424-9300

MATERIAL SAFETY DATA SHEET FOR

PRODUCT NAME, IDENTIFIERS, ETC.

LIQUID ALKALINE CLEANER #277

| SECTION 2 - HAZARDOUS INGREDIENTS | C.A.S.# | ACGIH TL | V OTHER | PERCENT |
|---|----------------|------------------|---------------------------|---------|
| SODIUM HYDROXIDE | 1310-73-2 | | 2mg/M OSHA | 30 |
| | | | | |
| | | | | |
| SECTION 3 - HMIS/NFPA RATING | ORASAN ON 0 | - SUGHT 2 - MODE | AATE 3 - HIGH 4 - EXTREME | |
| HEALTH 2 | FLAMM | ABILITY | 0 | |
| REACTIVITY . O | PERSON | AL PROTEOTION | В | |
| SECTION 4- PHYSICAL/CHEMICAL CH | ARACTERISTICS | | - | |
| BOILING POINT 210 F MELT | ING POINT 30 F | - | SPECIFIC GRAVITY 1.15 | |
| VAPOR PRESSURE (MM Hg) SAME AS WA | TER VAPOR | DENSITY (AIR-1) | SAME AS WATER | 1 |
| EVAP. RATE (BULAGEL-1) SAME AS WAT | TER SOLVE | LIT COMP | LETE | |
| PH (COND) 14.0 | pH (1% | 90UN 12.5 | | |
| APPEARANCE AND ODOR TRANSPARENT | , LIGHT BRO | WN LIQUI | D; MUSTY ODOR | |
| SECTION 5 - FIRE AND EXPLOSION HA | ZARD DATA | | | |
| FLASH POINT (METHOD USED) NONE (T.O. | C.) | | | |
| FLAMMABLE LIMITS UPPER LIMIT N.A. | LOWER | LIMIT N.A. | | |
| EXTINGUISHING MEDIA N.A. | | | | V-5-7-2 |
| SPECIAL FIRE FIGHTING PROCEDURES NONE | | | | |
| | | * | | |
| UNUSUAL FIRE AND EXPLOSION MAZARDS NONE | | | | |
| | | | | |
| | | | | |

ALL - CHEM CORPORATION BELIEVES THIS DATA TO BE ACCURATE AS OF THE DATE SHOWN. HOWEVER, ALL-CHEM MAKES NO WARRANTY AND DISCLAIMS ALL LIABILITY FOR RELIANCE THEREON. THE DATA IS OFFERED SOLELY FOR YOUR CONSIDERATION.

PREPARED BY: JEFF WANLESS - CHEMIST

DATE: 5-5-95

| | | VITY | |
|---|--|--|---|
| STABILITY | UNSTABLE | | OGNORION TO AVOID NONE |
| | STABLE | X | |
| INCOMPATIBILITY | (MATERIALS | TO AVOI | STRONG ACIDS |
| HAZARDOUS DECC | OMPOSITION OR | BYPROOL | ICTS NONE |
| HAZARDOUS | MAY OGG | TUR | CONDITIONS TO AVOID NONE |
| POLYMERIZATION | WILL NOT | OCCUR | X |
| 10) (100) | - made | | |
| 50/2015 17 5 | | | |
| SECTION 7 | - HEALT | H HAZ | ARD DATA |
| ROUTES OF ENTRY | Inhi | nation ? | YES Skin? YES Ingestion? YES |
| HEALTH HAZARDS | (Acute and Chro | nic) | IONE KNOWN |
| DARCINGGENTY | NTP? | N | D IARCT NO OSHAT NO |
| SIGNS AND SYMP | tams or exposu | ing B | URNING SENSATION TO SKIN AND SEVERE |
| IRRITATI | ON TO | EYE | S. NAUSEA MAY BE A SYMPTOM OF INGESTION. |
| | | | |
| EDICAL CONDITIO | | N | ONE KNOWN |
| MERGENCY FIRST | 10-10-10-10-10-10-10-10-10-10-10-10-10-1 | | HALATION: REMOVE VICTIM TO FRESH AIR. SKIN: |
| VASH OF | | | TALATION. REMOVE VIOLIM TO TREST AIR. SKIR. |
| | | 20 | AD AND WATER EVEC. EILIEU WITH CLEAR WATER |
| | FF WITH | | |
| OR 15 P | MINUTES | 3. [| NGESTION: GIVE LARGE QUANTITIES OF WATER OR |
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| SECTION 8 STEPS TO BE TAN RINSE I WASTE DISPOSAL TREAT | MINUTES UICE. SPILL OR KEN IN CASE MA DOWN T METHOD C IMENT F DR HANDLING ANI | DO PR LE TERIAL IN HE IN ILU | NGESTION: GIVE LARGE QUANTITIES OF WATER OR NOT INDUCE VOMITING. SEEK MEDICAL ATTENTION. AK PROCEDURES RELEASED ON SPILLED MOP OR VACUUM UP THE EXCESS AN RESIDUAL WITH WATER. TE OR NEUTRALIZE TO DRAIN, SEWER OR WASTE LITY (PER LOCAL CODE). BE USE RECOMMENDED PERSONAL PROTECTION. |
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DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION COMPLAINT LOG

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| | | | 1 - 1 | | |
|--|--|-------------|---------------------|--|--|
| COMPLAINT NO: C-01LV-0033 | DATE/TIME RECEIVED: 10/27/2000 | 15:09:02 | RECEIVED BY CE | | |
| assigned to: FL | DATE/TIME OF INCIDENT10/14/2000 | | DATE RSLID1/06/2000 | | |
| FACILITY: MASCOTECH | | SRN: B | 8709 | | |
| LOCATION: 2727 W 14 MILE | RD | COUNTY: O | COUNTY: OAKLAND CO | | |
| CITY: ROYAL OAK | | ZIP CODE: 4 | ZIP CODE: 48073 | | |
| CONTACT: STEVE MORRIS | PHONE NO: 8 | 10-597-3853 | | | |
| COMPLAINANT: ARTHUR RICHMOI | ND | | _ | | |
| LOCATION: 429 N. CHOCOLA | λY | PHONE NO: 2 | 48-288-0274 | | |
| CITY: CLAWSON | STATE: MI | ZIP CODE: 4 | 8017- | | |
| FOLLOW-UP CONTACT REQUESTED? Yes | DATE NOTIFIED: 10/08/2000 | TYPE: V | erbal | | |
| SOURCE TYPE: Industrial | EMISSION SOURCE: Fugitive | SCC CODE: | | | |
| SCC DESC: UNKNOWN | | | | | |
| SOURCE DESC: metal forming | operations | | | | |
| SOURCE OF COMPLAINT: Verbal | Secretary (| | | | |
| NATURE OF COMPLAINT: [x]Odor []Open Burning [] | []Opacity []Fug | itive Dust | | | |
| Legislative Liais | s called in to Linda Fow on. Incident happened at as type odor was detecte | 7PM on Oct | tober 14, | | |
| NAME: J N 1.7 | DATE: IV | 14-00 | SUPERVISOR: MW | | |

From:

Linda Fowler

To:

Marwan Khuri

Date:

Fri, Oct 27, 2000 2:59 PM

Subject:

Arthur Richmond

Arthur Richmond called today to get further information about an odor problem originating from Masco Tech, 14 Mile, Royal Oak (Oakland County). Mr. Richmond said he found that Masco Tech was purging their system with some chemical that smelled like gas. Even the fire department was called out, because residents reported smelling gas. Mr. Richmond said that Masco Tech is going to do the same purge in December, near Christmas, and that they do this on weekends or holidays when no one can be contacted to report the incident.

Mr. Richmond would like to know what is going on at Masco Tech and if the use of this chemical is approved by the state if it has a gas-like smell.

Please contact Mr. Richmond direct at 248-288-0274 or at 429 N. Chocolay, Clawson, MI 48017 give him your findings on this issue.

Please let me know when you have responded to him.

Linda R. Fowler
Assistant to Timothy R. Sowton, Legislative Liaison
Assistant to Bryan A. Harrison, Regulatory Reform Officer
517-241-7396
e-mail: fowlerlr@state.mi.us

e-mail. Towleringstate.mi.

CC:

Darlene Gingrich; Dennis Drake; Gerald Avery; J...

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: COMPLAINT INVESTIGATION

A-LV-04383

| FACILITY: MASCOTECH | sra 18709 | | |
|----------------------------------|---------------------------|--------------------|--|
| LOCATION: 2727 W 14 MILE RD | districtLIVONIA | | |
| CITY: ROYAL OAK | COUNTY: OAKLAND CO | | |
| CONTACT: STEVE MORRIS | ACTIVITY DATE: 11/03/2000 | | |
| REPORT DATE: 11/15/2000 | STAFF: FL | TRAVEL TIME: 1 HR | |
| LEVEL OF INSPECTION: 2 | TIME ON ACTIVITY4 HRS | | |
| COMPLAINT NO: C-01LV-0033 | DATE RESOLVED: 11/06/2000 | | |
| FOLLOW-UP CONTACT REQUESTED? Yes | TYPE Verbal | | |
| SOURCE CLASS: B | []NSPS []NESHAP [| PSD [TOXIC [MACT | |

REMARKS:

See A-LV-04373 for the resolution of this complaint.

Mr. Richmond was contacted on 11-08-2000. He has not called back.

| ATUS CODES: | C=COMPLIANCE | NC=NONCOMPLIANCE | NO=NOT OPERATING | U=UNDETERMINED |
|-------------|--------------|------------------|------------------|-----------------|
| | . 11. | | DATE: 1-16-00 | Material Inter- |

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION COMPLAINT LOG

| | The second secon | | | | |
|--|--|--|--|--|--|
| COMPLAINT NO: C-01LV-0020 | DATE/TIME RECEIVED: 10/27/2000 14 | :51:44 | RECEIVED BY CJM | | |
| ASSIGNED TO: FL | DATE/TIME OF INCIDENT10/14/2000 7p | m | DATE RSLVD: / / | | |
| FACILITY: MASCOTECH | | SRN: E | SRN: B8709 | | |
| LOCATION: 2727 W 14 MILE R | COUNTY: OAKLAND CO | | | | |
| CITY: ROYAL OAK | ZIP CODE: 4 | ZIP CODE: 48073 | | | |
| CONTACT: STEVE MORRIS | PHONE NO: 810-597-3853 | | | | |
| COMPLAINANT: SHELLY LEHMAN | | | | | |
| LOCATION: 449 NORTH CHOC | OLAY | PHONE NO: 2 | 48-435-4664 | | |
| CITY: CLAWSON | STATE: MI | ZIP CODE: 4 | 8017- | | |
| FOLLOW-UP CONTACT REQUESTED? Yes | DATE NOTIFIED: / / | TYPE: | | | |
| SOURCE TYPE: Industrial | EMISSION SOURCE: Undetermined | SCC CODE: | | | |
| SCC DESC: UNKNOWN | | | | | |
| SOURCE DESC: Odor from clea | ning solution | | 777 | | |
| SOURCE OF COMPLAINT: Verbal | | | | | |
| | []Opacity []Fugit: | | | | |
| incident that occurs. Ms. Lehman said the type odor in their department and the she noticed the occurs informed Mascotech located to Consumers, Mascote it an odo: | oo, Ms. Shelly Lehman called ured on October 14, 2000 at that she and her neighbors in neighborhood. She called police department. This dor. After investigating to Ms. Lehman that the odor at 2724 W. 14 Mile Road in cotech added something to our. Consumers told Mascotech it again. Mascotech apparents. | t approximation of the companies of the companies of the control o | imately 7 pm. a natural gas mers, the fire first time laint, e from the Oak. According heir cleaners tify them | | |

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: COMPLAINT INVESTIGATION

A-LV-04373

| FACILITY: MASCOTECH | SRAB8709 | | |
|----------------------------------|-------------------------------|-----------------------|--|
| LOCATION: 2727 W 14 MILE RD | DISTRICTLIVONIA | | |
| CITY: ROYAL OAK | COUNTY: OAKLAND CO | | |
| CONTACT: KATHY DYER | ACTIVITY DATE: 11/03/2000 | | |
| REPORT DATE: 11/03/2000 | TRAVEL TIME: 1.0 HR | | |
| LEVEL OF INSPECTION: 2 | FACILITY COMPLIANCE STATUS: U | TIME ON ACTIVITY4 HRS | |
| COMPLAINT NO: C-01LV-0020 | DATE RESOLVED: 11/06/2000 | | |
| FOLLOW-UP CONTACT REQUESTED? Yes | TYPE: | | |
| SOURCE CLASS: B | []NSPS []NESHAP [| PSD []TOXIC []MACT | |

REMARKS:

I conducted an inspection at the facility on November 3, 2000 and met with Kathy Dyer, Safety Director (248) 577-8905. Kathy mentioned that she was not aware of a natural gas type odor coming from the facility that occurred last October 14, 2000 at 7PM. This facility manufactures and forms automotive metal parts from steel. Steel parts manufactured here are used as raw materials for their other plants that manufacture automotive parts. This facility operates 24 hours/day up to 6 days/week. Steel parts are formed using hot forming machines, cold forming machines and ring roller machines. In hot forming, the steel is heated to just below the melting temperature, using an electric induction furnace. The metal is then cut and shaped. In the cold forming machine, the metals are shaped by applying pressure to it. Lubrication fluid, also called soap-lube is applied to the steel before it is cold formed. In the ring roller, the metal rolls and spins as pressure is applied to it. The furnaces are exempt from permits because they are electrically fired. The metal washer chemical that they use is soap based. They do not use any solvent cleaner for the metal parts. They use a small amount of solvent to clean machinery parts. They have a permit 486-89 for shot blasters with Torit dust collectors. I did not smell any natural gas type odor inside and outside the facility.

I got a call back from Tim Hayward, night shift superintendent. He confirmed that they use a metal cutting drawing compound (lubricant) with a natural gas odor in one of their hot forming machines. This machine is not used regularly. Tim said he will

| STATUS C | ODES: | C=COMPLIANCE | NC=NONCOMPLIANCE | NO=NOT OPERATING | U=UNDETERMINED |
|----------|-------|--------------|------------------|------------------|----------------|
| NAME: _ | J | -1.2 | • | DATE: [(-14-00 | SUPERVISOR: |

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: COMPLAINT INVESTIGATION

ION A-LV-04373

FACILITY: MASCOTECH

SRMB8709

REMARKS:

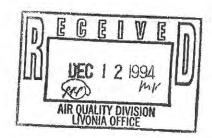
call me up if that machine is scheduled for use.

I contacted Shelly Lehman on November 6, 2000 and informed her regarding the results of my inspection. She said she will also inform the other complainant, Mr. Richmond regarding the situation.

MascoTech

December 8, 1994

 $v_{c} = i$



Mr. R. R. Pinga, Engineer Department of Natural Resources 38980 Seven Mile Road Livonia, MI 48152

REF: E.I. #B-6247

Dear Mr. Pinga:

With reference to your reported observation of air pollution violations at our plant on October 27, 1994, we are offering the following in explanation.

The probable cause of the violation was a misunderstanding of the permit rules. The condition which you observed had been in existence for several weeks and has since been eliminated.

Permit #614-92 was issued for a large wet scrubber unit which was used in conjunction with three high production automotive buffing machines. Those machines have been out of production for several years.

The operation which you observed is a non-production operation which is used to rework parts that have been marred in handling. Our error was that the equipment which was connected to a cyclone filter should not have been vented to the outside of the plant.

We have since disconnected the vent pipe to the outside and the air is released only into the general in-plant environment. We have operated this equipment intermittently since your visit and will take it completely out of service within the next few weeks.

MascoTech, Inc.

MascoTech Accessories 1721 Dove Street Port Huron, MI 48060 810-987-2670 Fax: 810-987-5508 MascoTech, Inc.

We would like to thank you for your understanding and useful advice given during your visit. If further information is required please call.

Sincerely,

William E. Bowers Plant Manager

(810) 987-2670 ext. 204

cc: E. Jones J. DiLuca

WEB:mtf

STATE OF MICHIGAN

NATURAL RESOURCES
COMMISSION
JERRY C. BARTNIK
LARRY DEVUYST
PAUL EISELE
JAMES P. HILL
DAVID HOLLI
JOEY M. SPANO
JORDAN B. TATTER



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

ROLAND HARMES, Director

SOUTHEAST MICHIGAN DISTRICT HEADQUARTERS 38980 Seven Mile Road Livonia, Michigan 48152

November 16, 1994

E.I. #: B-6247

Mr. William Bowers, Plant Manager MascoTech Accessories 1721 Dove Street Port Huron, Michigan 48060

Dear Mr. Bowers:

On October 27, 1994, the Michigan Department of Natural Resources, Air Quality Division (MDNR-AQD) conducted an inspection of your facility's air emission sources located at 1721 Dove Street, Port Huron, Michigan. The purpose of this inspection was to determine the compliance status of your facility with the requirements of the Federal Clean Air Act, as amended; Michigan Air Pollution Act; the rules of the MDNR-AQD; and the conditions of your air use permits. During my inspection I observed the following air pollution violation:

| Citation of Rule or | |
|---|---|
| Permit Condition Violated | Comments |
| Permit #614-92; Special Condition #18. Permit #614-92; Special Condition #4. | Operating 3 buffing equipments without the wet scrubber. Rule 201 violation, substituted the wet scrubber with a cyclone as particulate control equipment without an approved permit modification. |
| | Permit #614-92; Special Condition #18. Permit #614-92; Special |

Enclosed is a copy of the above cited rule and permit conditions.





| 1994 | 7 | F | M | A | M | 5 | 7 | A | 5 | 0 |
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| P.V.C. | | | | | | ~ | 470 % | | | |
| 20RM377 | 65280 612100 2017600 | 1650 | 19870 | 2200 | 16500 | 11028 | 4 | 99003 | 385 | 552 |
| 0.000 | @12100 | 110028 | 11000 | 143000 | 11000 | 6600 |) | 1634 | 12118 | 552 330 |
| and (| 2007600 | | | 163002 |) | 13200 | | 2700 | 8125 | 330 |
| | | | | 70-00 | | | | 3300 | 3185 | 330 |
| Total Monthly | 34980 | 17600 | 30,800 | 32800 | 27500 | 36828 | → | 17534 | 23410 | 2090 |
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| GIUE 20RM072 GALLONS | | | | - MINOSTRUM. | | | | | | |
| 20RM072 | 100 | 100 | 0 | 50 | 50. | 50 | 0 | 100 | 50 | 0 |
| GALLONS | | | | | | | | | | |
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DEPARTMENT OF NATURAL RESOURCES AIR QUALITY DIVISION ACTIVITY REPORT: SCHEDULED INVESTIGATION

ACTIVITY REPORT: SCHEDULED INVESTIGATION A-LV-00563

| FACILITY: MASCOTECH ACCESSOR | DISTRICTLIVONIA | | |
|------------------------------|-------------------------------|--------------------------|--|
| LOCATION: 1721 DOVE STREET | | | |
| CITY: PORT HURON | COUNTY: SAINT CLAIR | | |
| CONTACT: WILLIAM BOWERS/ERIC | ACTIVITY DATE: 10/27/94 | | |
| REPORT DATE: 11/03/94 | STAFF: RRP | TRAVEL TIME: 3 HRS. | |
| LEVEL OF INSPECTION: 2 | FACILITY COMPLIANCE STATUS: C | TIME ON ACTIVITY 12 HRS. | |
| SOURCE CLASS: []A1 []A2 | []NSPS []NESHAP [] | PSD []TOXIC [x]OTHER | |

INSPECTION RESULTS:

| | QTY | SOURCE | C/CONTROL | <u>P</u> | ERMIT/R | ULE/ORDER | STATUS | 5 |
|---|-----|--------|---------------------------|----------|---------|-----------|--------|---|
| 1 | | 001 | PLASTIC COEXTRUSION LINE | PI | NO. | 600-82A | С | |
| 2 | | 002 | GLUE APPLIC./MASK WASHERS | PI | NO. | 569-92 | NO | |
| 3 | | 003 | BUFFING/SANDING MACHINE | PI | NO. | 614-92 | NC | |
| 4 | | 004 | STAINLESS STEEL BUFFING | PI | NO. | 686-92 | NO | |

REMARKS:

Vint - -

I conducted a level 2 scheduled investigation on St. Clair Metal Products now known as Mascotech Accessories. located at 1721 Dove St., Port Huron, Michigan. This facility is actually connected to another building located at 2655 16th St., Port Huron. Our QMFDBA file revealed an SRN of N3372 for this second address. Since, these 2 buildings are now connected by an enclosed structure these facilities can now be considered as one facility. I will talk to Jim Stewart about this so that both buildings will only be assigned one SRN (State Registration Number).

This facility manufactures stainless trim moldings with plastic components and stamped metal parts. The stainless trim is cut and co-extruded with polyvinyl material which is glued to produce the final product. This operation is under permit to install no. (PTI) 600-82A. From adhesive coating usage records beginning January until October 26 this year, the company used only 500 gallons. This is less than the 3565 gallons limit in the permit. Bill Bowers indicated that the company is looking into subcontracting the adhesive application part so that by next year

| STATUS | CODES: | C=COMPLIANCE | NC=NONCOMPLIANCE | NO=NOT OPERATING | U=UNDETERMINED |
|--------|--------|--------------|------------------|------------------|--------------------|
| NAME: | Je. | ild Bi | | DATE: 11/08/94 | SUPERVISOR: MZ |
| | / | 11 | | | Page 1 (CONTINUED) |

DEPARTMENT OF NATURAL RESOURCES AIR QUALITY DIVISION ACTIVITY REPORT: SCHEDULED INVESTIGATION

A-LV-00563

FACILITY: MASCOTECH ACCESSORIES

ESTABLISHMENT NOB6247

REMARKS:

the company can get rid of the adhesive coating process. I indicated to Bill Bowers that the company can request to void the permit as soon as the equipments are removed from the site.

Permit 614-92 was issued for five manual buffing and sanding machines, one automatic buffer, and a wet scrubber to control the particulate emissions from these operations. During the inspection, all the equipments were removed except for three manual buffing equipments that has a cyclone collector attached to it. The remaining equipments were not operating at the time of the inspection. I indicated to Bill that the cyclone collector cannot substitute the scrubber as a control equipment without applying for a permit modification or a written approval from DNR Air Quality Division since the cyclone collector is less efficient than the scrubber. This is a violation permit 614-92 special condition no. 18 which states that "the applicant shall not operate the operations unless the scrubber is installed and operating properly". This is also a violation of general condition no. 4 (Rule 201 violation) for modifying the equipments without an approved permit to install (modify). I am sending the company a letter of violation.

The four glue applicators and four mask washers covered by permit no. 569-92 have all been removed. I indicated to the company that the permit can now be voided since the equipments are no longer installed and operating.

Similarly, the stainless steel buffing operation under permit no. 686-92 is no longer operating and the equipment has been removed. This permit can now be voided.

As a result of my inspection, only permit 600-82A will have a relevant air emission. Since the VOC limit for this permit is 9.0 tons/year, this becomes the company's VOC potential to emit. Since this is less than 10 tons, then the company is not subject to the Title V fee. I will be recommending that the company be stricken out of the Title V fee list.

| | (Reg) | 11/08/94 |
|-------|-------|-------------------|
| NAME: | | DATE: SUPERVISOR: |

M m - This has been taken and of.

MascoTech



Mr. Armbruster
Supervisor-Permit Division
Air Quality Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Mr. Armbruster,

Please accept this letter as notification that Huron St. Clair Inc. has changed our name to Mascotech Accessories Inc. Please reference the following permits: 614-92, 686-92, 600-82A, 569-92. Your cooperation in this matter is greatly appreciated.

Sincerely,

Everett E. Phelps

Safety/Environmental Coordinator

cc: BERNARDO B. SIA

MascoTech, Inc.

MascoTech Accessories 1721 Dove Street Port Huron, MI 48060 313-987-2670 Fax. 313-987-5508



APR 0 1 1993 M

AIR QUALITY DIVISION

Mr. Bernardo B. Sia Senior Environmental Engineer Air Quality Division 38980 7 Mile Rd. Livonia, MI 48152

March 29, 1993

Dear Mr. Sia;

Per our telephone conversation of Wednesday, March 24, 1993 please accept this letter as my request on behalf of Huron St. Clair Inc. to remove Air Use Permit No. 266-92. As I outlined in our conversation, the equipment Permit No. 266-92 was established for has been relocated to Huron St. Clair Inc. plant II 1721 Dove St. Port Huron Michigan. The emission controls have been changed to an AGET VCM-2 fiberglass filter system which discharges directly into the work environment.

Please feel free to contact me at (313) 987-2670 Ext. 240 if you have any questions or require further information.

Sincerely,

Everett E. Phelps Safety/Environmental



Michigan Department of Natural Resources Air Quality Division P.O. Box 30260 Lansing, MI 48909

March 11, 1993

Air Quality Division;

Please accept this letter as notification that the Huron St. Clair Inc. facility located at 2655 16th street in Port Huron MI will close and cease operations as of March 31, 1993. The equipment listed under SRN: N3372 ceased operations on December 31,1993.

Any future correspondence for this facility should be sent to Huron St. Clair at 1721 Dove street in Port Huron MI. to the attention of Everett E. Phelps.

If you have any questions or require further information please feel free to contact me at (313) 987-2670.

Sincerely

Everett E. Phelps Safety/Environmental



FEB 10 1993 FED

AIR QUALITY DIVISION BB

February 8, 1993

Mr. Bernardo B. Sia Environmental Engineer Air Quality Division Department of Natural Resources 38980 Seven Mile Road Livonia, Michigan 48152

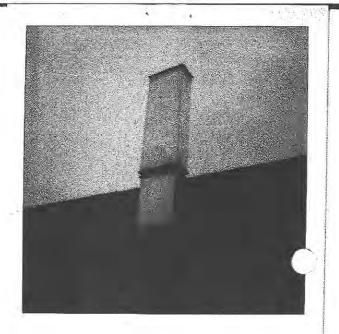
Dear Mr. Sia:

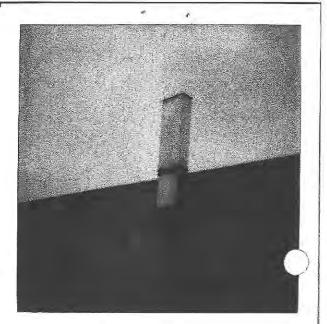
In response to your letter dated December 9, 1992 concerning a deficiency in meeting the requirements of Special Condition 19 on permit no. 614-92, Huron St. Clair Inc. has corrected the problem as evidenced by the pictures enclosed.

Regarding the deficiencies on permit No. 266-92 the press referenced in this permit has not, as of yet been relocated. Upon the relocation of this piece of equipment a request to modify the permit will be submitted.

If you have any questions or comments please feel free to contact me at (313) 987-2670 ext. 240

Everett E. Phelps Safety/Environmental







Mr. Bernardo B. Sia Environmental Engineer Air Quality Division Department of Natural Resources 38980 Seven Mile Road Livonia, Michigan 48152 December 23, 1992

RECEIVED

DEC 28 1992

AIR QUALITY DIVISION

Dear Mr. Sia:

I am in receipt of your letter dated December 9, 1992 and am responding on behalf of Huron St. Clair Inc. concerning the compliance status of our air use permits nos. 266-92 & 614-92.

As stated in your letter Huron St. Clair Inc. has deficiencies in meeting the requirements of Special Condition No. 19 on the above referenced air use permits, specifically that the exhaust gases are to be discharged unobstructed vertically upwards to the ambient air from stacks 10 feet and 15 feet, respectively above ground level. In accordance with your request the following are details on the actions taken to correct the situation.

- 1. It has been determined that the probable causes were unintended improper installation of the exhaust stacks.
- 2. Concerning air use permit no. 266-92 (Metal Parts Production Press) this piece of equipment is tentatively scheduled to be moved and reinstalled at our 1721 Dove Street Port Huron facility location the week of February 8, 1992. When it is determined where this piece of equipment will be located within the Dove Street facility I will be submitting a request to modify the permit.
- 3. Concerning air use permit no. 614-92 (Buffing Sanding Operations) installation of the exhaust stack as required in Special Condition No. 19 will tentatively be completed by February 15, 1993 weather conditions permitting.
- 4. To prevent any reoccurrence all future installations will be coordinated through my department.

Sincerely

Everett E. Phelps Safety/Environmental

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION
LARRY DEVUYST
PAUL EISELE
GORDON E. GUYER
JAMES P. HILL
DAVID HOLLI
O. STEWART MYERS
JOEY M. SPANO

JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

ROLAND HARMES, Director

SOUTHEAST MICHIGAN DISTRICT HEADQUARTERS 38980 Seven Mile Road Livonia, Michigan 48152

December 9, 1992

E.I. #: B-6247

Mr. Everett Phelps Huron St. Clair, Inc. 2655 16th Street Port Huron, Michigan 48060

Dear Mr. Phelps:

On December 2, 1992, the Air Quality Division, Department of Natural Resources, conducted an inspection of your facility's air emission sources located at 2655 16th Street and at 1721 Dove Road, Port Huron, Michigan. The purpose of this inspection was to determine the compliance status of your facility requirements of the Federal Clean Air Act, as amended; Air Pollution Act; the rules of the Michigan Air Pollution Control Commission (MAPCC); and conditions of your air use permits. During my inspection I observed the following pollution violations:

<u>Process Description</u>: Metal Parts Production Press, and Buffing/Sanding Operation.

Citation of Rule or

Permit Condition Violated: Permit Nos. 266-92 and 614-92, Special Condition No. 19.

Comments: Permit Nos. 266-92 and 614-92, Special Condition No. 19 requires the exhaust gases from the operations to be discharged unobstructed vertically upwards to the ambient air form stacks at an exit point not less than 10 feet and 15 feet, respectively, above ground level.

You should immediately initiate the necessary actions to correct the cited violations. Additionally, within 14 days of the date of this letter, please submit, in writing, a detailed report of the actions you have taken to correct the violations. As a minimum, this report should explain the probable causes of the violation, remedial action taken, and what steps are being undertaken to prevent a reoccurrence.

Mr. Everett Phelps Page 2 December 9, 1992

I would like to thank you for the cooperation which was extended to me during my inspection. If you have any questions, please call me.

Sincerely,

Bernardo B. Sia Environmental Engineer Air Quality Division 313-953-0248

BBS:ec

cc: Gerald Avery, Regional Supervisor
Barbara Rosenbaum/Dave Batchelor, Compliance & Enforcement
Fred Rieth, District Supervisor

A-LV-

DEPARTMENT OF NATURAL R. JOURCES AIR QUALITY DIVISION ACTIVITY REPORT: SELF-INITIATED INVESTIGATION

| FACILITY: H | URON | ST CI | AIR, IN | IC. | ESTA | IL I SHME | NT NO: B6247 | 7 |
|------------------|----------|--------|---------|--|--------|-----------|--------------|----------|
| LOCATION: 1 | 721 D | OVE 9 | STREET | | DISTR | ICT: L | .IVONIA | |
| CITY: PORT HURON | | | | | COUNT | Y; E | SAINT CLAI | R |
| CONTACT: E | VERET | T PHE | ELPS | | ACTIV | ITY DAT | E: 12/03 | 5/92 |
| REPORT DATE: | 12/ | 02/92 | ? | STAFFY BBS | TRAVE | L TINE | 2HRS. | |
| LEVEL OF INS | PECTION: | 2 | | FACILITY COMPLIANCE STATUS: NC | TIHE | ON ACTI | VITY: 2HRS. | |
| SOURCE CLASS | ı E | JAI | E 3A2 | C JNSPS C JNESHAP C | : JPSD | E. | JTOXIC C | x JOTHER |
| INSPE | CTION | RESL | ILTS: | | 7.5. | | | |
| | QIY | SOURCE | CONTROL | | PERI | HIT/RUL | E/ORDER | STATUS |
| 1 | 3 | 010 | | ERS #600-82 OVE ST. FLANT | PI | NO. | 600-82A | С |
| 2 | 5 | 011 | 1721 D | G & SANDING MACHINE DVE ST PLANT RUBBER LOW EFFICIENCY | PI | NO. | 614-92 | NC |
| | | | | | | | | |
| 3 | 2 | 012 | 16TH S | PRESSES T. PLANT CYCLONE | ΡI | NO. | 266-92 | NC |

THE COMPANY HAVE TWO MANUFACTURING PLANTS. ONE IS LOCATED AT 1721 DOVE ROAD AND THE OTHER AT 2655 16TH ST. THE BULK OF THE MANUFACTURING IS DONE AT THE DOVE ROAD PLANT. 16TH ST. PLANT IS WHERE THE PLANT OFFICES ARE LOCATED AND A FEW MANUFACTURING PRO-CESSES. DIFFERENT AUTOMOBILE STRIP MOLDINGS AND TRIMS, AND TYPES OF ROOF RACKS ARE MANUFACTURED IN THE PLANT. THEY SUPPLY SEVERAL AUTOMOTIVE ASSEMBLY PLANTS AND ALSO THE AFTER THE MARKET SUPPLIERS.

PLASTIC CO-EXTRUSION LINES UNDER PERMIT TO INSTALL # 600-82A WERE OBSERVED IN OPERATION. STAINLESS STEEL MOLDING PARTS WERE BEING ASSEMLED WHERE ADHESIVE IS BEING MECHANICALLY APPLIED TO STRIP OF PVC AND ROLLED TO BIND ONTO STAINLESS STEEL STRIP MOLDING.

| STATUS CODES: | C=COMPLIANCE | NC=NONCOMPLIANCE | NO | =NOT OPERATING | U=UNDETERMIN | IED | |
|---------------|--------------|------------------|-------|----------------|--------------|------------|--|
| NAME: | 8 | | DATE: | 12/03/92 | SUPERVISOR: | <u>(ā)</u> | |

DEPARTMENT OF NATURAL R JURCES AIR QUALITY DIVISION ACTIVITY REPORT: SELE-INITIATED INVESTIGATION

A-LV-

| ACILITY: HURON ST CLAIR, INC. | T JESTABLISHHENT ND: B6247 |
|---|---|
| REMARKS: | |
| COMPANY RECORDS SHOW TOTAL ADHES GALLONS. LESS THAN THE PERMIT LI ANTICIPATES A LESSER TOTAL THIS | MIT OF 3565 GALLONS/YEAR. COMPANY |
| METAL PARTS PRODUCTION PRESS WIT TO INSTALL # 266-92 WAS OBSERVED OPERATION WITH PERMIT TO INSTALL PROCESSES WERE INVIOLATION OF TH THE RESPECTIVE PERMITS. LOV WAS | . ALSO THE BUFFING AND SANDING . # 614-92 WAS OBSERVED, BOTH IE EXHAUST STACK REQUIREMENTS OF |
| • | |
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| | |

DATE: 12/03/92 SUPERVISOR:

DEPARTMENT OF NATURAL RESOURCES AIR QUALITY DIVISION ACTIVITY REPORT

| St. Clair Metal Products | S | COUNTY 50 | B-6247 |
|--|--|-----------------|----------------------------|
| EQUIPMENT LOCATION 1721 Dove Street | | DISTRICT 3 | DATE MM DD YY 03 / 14 / 90 |
| Port Huron, MI | | STAFF K. Damrel | TRAVEL TIME |
| Dean Cunningham, Plant E | Engineer | | TIME ON ACTIVITY |
| COMPLAINT RECEIVED COMPLAINT INVESTIGATION PARTIAL SCHEDULED INVESTIGATION COMPLETE SCHEDULED INVESTIGATION | SOURCE TEST MONITORING VISIBLE EMISSIONS OBSERVAT SAMPLE COLLECTED | ON | |
| | NESHAP NSPS | □ CEM □ PSD | |
| LEVEL OF INSPECTION: | XX LEVEL II | □ LEVEL III | |
| INSPECTION RESULTS / REMARKS: SOURCE / CONTROL | PERMIT / RULE / ORDER | | STATUS |
| Plastic crosshead | P/O #600-82 | C | Compliance |

In this plant the company produces 2 main products. One is internal parts for transmissions, these are produced through a heavy stamping process and there are very little air emissions in this process. the second process the company produces stainless steel trim moldings for automobiles. The stainless steel for these moldings is received at the plant in a roll. It is unwound onto a line, then is passes through a roll forming process which puts various bends into the part to form the molding. Then the molding passes through a cleaning process in which an alkaline solution and a phosphoric acid solution are used to clean the stainless steel molding. Then the molding passes through a drying process and adhesive is applied to the molding. The adhesive is applied so that the vinyl that will later be applied will adhere to the stainless steel surface. Then the molding passes through an extruder where a poly vinyl material is extruded onto the surface of the molding. Then a clear plastic coating is placed on the molding to protect it in shipping and the molding is then sheared into lengths.

| STATUS CODE: C = COMPLIANCE; NC = NONCOMPLIANCE | NO = NOT OPERATING; U = UNKNOWN | |
|---|---------------------------------------|--|
| NAME Kenneth L Danvel | DATE OF 4/12/90 SUPERVISOR'S INITIALS | |

DEPARTMENT OF NATURAL RESOURCES AIR QUALITY DIVISION

ACTIVITY REPORT (Continued)

| St. Clair Metal Products | COUNTY 50 | B-6247 |
|--------------------------|-----------------|-------------------------|
| 1721 Dove Street | DISTRICT | DATE MM DD YY 03/14 /90 |
| Port Huron, MI | STAFF K. Damrel | 03/14 /30 |

INSPECTION RESULTS/REMARKS:

The moldings are then transferred to another area of the plant where they are cut into exact lengths to fit on the cars, and insulating materials are placed on the molding. The moldings are then packed for shipment. In terms of air emissions this is a very small source. The company used to have an anodizing and an acid etching process. This process has been removed the plant and the permits have been voided.

There were no visible emissions from the plant stacks and there were no violations observed in the areas reviewed during this inspection.

NAME Kenneth L. Darrel DATE OF 4/12/90 SUPERVISOR'S MK

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON E. R. CAROLLO JACOB A HOEFER STEPHEN F. MONSMA HILARY F. SNELL PAUL H. WENDLER HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

2455 N. Williams Lake Road Pontiac, Michigan 48054

October 25, 1983

St. Clair Metal Products 1721 Dove Street Port Huron, Michigan 48060

Attention: Mr. Dean Cunningham

Gentlemen:

On October 19, 1983 we conducted an investigation of your operation located at 1721 Dove Street in Port Huron. The purpose of our investigation was to determine the compliance of your operations with the Michigan Air Pollution Control Commission rules.

As a result of our evaluation of your operation, and since we have not received any public complaints regarding excessive emissions from your facility, we will consider your operation in compliance with the Michigan Air Pollution Control Commission rules until investigation and/or complaints may indicate otherwise.

Should you have any questions regarding this matter, please call our office at 666-2700.

Sincerely,

Marwan A. Khuri, P.E.

Air Quality Division

MATURAN AK

MAK:mh

#B-6247

DEPARTMENT OF NATURAL R URGES AIR QUALITY DIVISION

| | COMPLAINT | NESHAP |
|---|------------------------------------|---------|
| | PERMIT ACTION | NSPS |
| X | ANNUAL COMPLIANCE INVESTIGATION | REVISED |

| ACTIVITY REPORT | X INVES | AL COMPLIANTIGATION | NCE | | REVISED STATUS | | | |
|--|--|-----------------------------------|--|---|-------------------------------------|------|-----------|--|
| AQ-42 | Inspection time | | | | DATE MM/DD/YY | | | |
| ESTABLISHMENT | | NO. | | | 10/19/83 | | Isio | |
| | | | | | COARTER | | NO. | |
| St. Clair Metal Products NUMBER AND STREET | | B-6247 | - | | STAFF | | 04 No. | |
| 1721 Dove Street | | Port Hur | on | | Khuri | | 26 | |
| CONTACT | | TITLE | | | COUNTY | | NO. | |
| Dean Cunningham | | Plant Man | ag | er | St. Clair | | 74 | |
| PRIMARY ACTIVITY | | | | | DISTRICT | | NO. | |
| Anodizing Plant | | | | | Pontiac | | 03 | |
| | randomica 1000kg | | | | PROJECT | | | |
| An annual inspection of the 1721 Dove Street in Port Huron wa is operating an anodizing operati tank. The operation is controlle the anodizing operation, including | s conducted. The on that includes d by a scrubber. | company an acid Both ere | 02 03 04 05 07 08 09 | MAJOR S MINOR S RESIDEN MEETING TRAININ | SOURCE NCE G — CONFEREN IG | CE | | |
| operating satisfactorily in regard | ds to air polluti | on | | SURVEY | | TYPE | NO. | |
| _emissions. | | - | _ | | N POINTS | TTPE | NO. | |
| | | | | INVESTI | | | | |
| The plastic cross head extr | usion line was al | SO 0 |)2 | VISIBLE | EMISSION | | | |
| observed in operation. This line | consists of melt | ing | | EVALUA SOURCE | TION TEST (STAFF) | | | |
| plastic pellets and extruding then | n or coating them | on | 14 | SOURCE | | | | |
| chrome plated parts. The equipment was operating | | | 6 | GRAB SA PICTURE | MPLE S TAKEN | | | |
| satisfactorily. No visible emiss | ions were observe | d1 | 0 . | -inci | | | | |
| I also checked the acid storage to | ank. It is not co | ontrolled | | | | | | |
| by a lime box for the control of a | acid fumes when t | he tank 1 | 4 . | | | | _ | |
| is filled. This company seems to | operate in compl | iance 1 | 6 | | | | | |
| with the Michigan Air Pollution Co | ontrol Commission | rules 1 | 7 . 8 . | | | | _ | |
| and regulations. | | | 9 | OTHER (e | explain) | | | |
| | Marwan | | | COMPLIA | ANCE STATUS | | | |
| | 7. 4.00 | | . | IN COMPI | LIANCE | | | |
| | | В | | | N COMPLIANC | | | |
| | | c | C. OUT OF COMPLIANCE NOT | | | | 1 | |
| | | | | | CHEDULE | du. | 1 | |
| | | | . (| | EDULE MEET! | NG | | |
| * | | | | INCREM | IENTS IEDULE, NOT | | | |
| | | | | | IG INCREMENT | S | | |
| | | F | . (| | EDULE, NOT | / |) | |
| | | | | | IF MEETING | (15) | 1 | |

| ST CL | AIR METAL PRODUCTS | DISTRICT NO. | 03 | | | | PRODUCED 03/ | /24/83 |
|----------|--|----------------------------|----------------|-------------|------------|-----------|-----------------|--------|
| ANODIZ | VICAL TECHNOLOGIES INC ZING PLANT 21 DOVE STREET | COUNTY 74 SA | INT CLAIR | M | Khuri | | NO. 26 | |
| PORT H | | ESTAB. NO. BG 313 98451 | 5247 CONT. | or Dean | Cunningh | am | DATE 10/19 | 182 |
| BILLET | FOR SCHEDULED INVESTIGATION | TION | TOTAL | TIME, HOURS | • | TED TIME, | | |
| FQY SID | ECODE SOURCE NAME | PIECES | AVGHOURLY-RATE | | - CONTROLS | PART. E | STIMATED EMISSI | |
| 00.5 001 | 0076 ANDDIZING OPERATIO | ON 1 | | SCRUBBER | 1 | | | |
| 002 | 9999 H3PO4 STORAGE TANK | | 1.03 GALS | | | | | |
| 003 | 9999 HNO3 STORAGE TANK | 1 | .57 GALS | | | | | |
| 004 | 9999 H2504 STORAGE TANK | 1 | .80 GALS | | | | | |
| 005 | 9999 NAOH TANK | 1 | . 14 GALS | | | | | |
| 006 | 1219 #2 FUEL DIL TANK | i | GALS | | | | | |
| 007 | 0018 PROCESS BOILER | 1 | 3.60 MMB | | | | | |
| 800 | 1256 TRICHLORETHANECLE | ANE 1 | 1.07 GALS | | | | .05 | |
| 01.0 009 | 1100 FLOW COATER & OVER | | .98 GALS | | | | | |
| | | | 2,3,0,0,0,0,0 | | | | | |

2455 N. Williams Lake Road Pontiac, Michigan 48054

September 29, 1982

St. Clair Metal Products 1721 Dove Street Port Huron, Michigan 48060

Attention: Mr. Aaron Baker

Dear Sir:

Per our conversation of September 24, 1982, please be advised that the polyvinyl chloride vinyl extrusion line recently installed by your firm is subject to permit requirements by Rule 201 of the Michigan Air Pollution Control Commission. Enclosed is an application for an air use permit for this process. Please complete it and submit it as soon as possible to our Lansing Permit Unit (address on back side of application).

Thank you for your prompt attention to this matter. If you have questions or require further information, please call this office at 666-2700 or our Permit Unit at 517-322-1333.

Sincerely,

Frederick H Roth

Frederick H. Rieth Resource Specialist Air Quality Division

FHR: mh

Enclosure

DEPARTMENT OF NATURAL RESOURCES AIR QUALITY DIVISION

ACTIVITY REPORT

| COMPLAINT RECEIVED | NESHAP |
|--------------------|---------|
| PERMIT ACTION | NSPS |
| ANNUAL COMPLIANCE | REVISED |

| | | | DATE MM/ | 2-2-6 | |
|---|--|--------------------|-------------------------------|----------|-----|
| ESTABLISHMENT | | | | 24.8 | 2 |
| St Clair Metal Products | NO. | 21.5 | QUARTER | | NO |
| NUMBER AND STREET | S - 6: | 247 | CTACE | | 3 |
| 1721 Dove | 011 | | F Rie | LI: | NO |
| CONTACT | TITLE | uren | COUNTY | L | NO. |
| Dean Cumningham, Aaron Baker | | | St Cla | ir | 7 |
| PRIMARY ACTIVITY | | | DISTRICT | | NO |
| REMARKS: | | | Pontia | C | 0 |
| In answering inquiries about EI form | la 1 | | PROJECT | | |
| - Torm | s, I learned | | R SOURCE | | |
| this company has recently installed a Pi | 10 extrusion | 02 MINOR | R SOURCE | | |
| | | | NG – CONFERE | NCE | |
| line Without obtaining a Permit to Inst | tall. I | 05 TRAIN | | | |
| | | 07 | | | |
| drafted a letter to the company explaining | | 08 | | | |
| s required by Rule 201 & requesting they | suboit a | 10 | | | _ |
| | The state of the s | -0.7 | (explain) | | |
| raid application ASAP. | | OU CITIES | i texpiani) | | |
| The Duc and the will a D | -11 | SURVE | Y ACTION | TYPE | NO |
| The PVC process also involves use of. | some solvents. | | ON POINTS | | |
| Aaron Baker said if a permit is required | Les clould | | FIGATED | | |
| | | 02 VISIBL EVALU | E EMISSION ATION | | |
| send the letter & application form to his a | Henteon, | 03 SOURC | E TEST (STAFF) | \vdash | |
| | | 04 SOURC | | | |
| | | (COM | PANY) | | |
| | | 05 GRABS | | | |
| | | | ES TAKEN | | |
| | | 10 | CATEGORIA (A) | | |
| | | 11 | | | |
| | | 12 | | | |
| | | 13 | | | |
| | - | 14 | | - 5 | |
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| | | 16 | | | - |
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| 4 | | 19 | | | |
| | | 00 OTHER | | | |
| | | | IANCE STATUS | | |
| | | A. IN COM | | L | |
| | | | WN COMPLIANCE COMPLIANCE N | | |
| | | | CHEDULE | | |
| | | | HEDULE MEETI | VG | |
| | | | MENTS | | |
| 19.3 | | | HEDULE, NOT | | |
| | | | NG INCREMENT | s La | 1 |
| | | | HEDULE, NOT | 6 | Y |
| | | INCRE | | - 1 | M |

2455 N. Williams Lake Road Pontiac, Michigan 48054

August 4, 1982

1647

St. Clair Metal Products 1721 Dove Street Port Huron, Michigan 48060

Attention: Mr. Dean Curningham

Gentlemen:

On July 7, 1982 staff of this office conducted an annual inspection of your anodizing line scrubber system. An inspection for the Resource Conservation and Recovery Act was conducted at the same time with Mr. Tom Rich of your facility.

No apparent air violations were observed during the inspection and a few recordkeeping and paperwork violations of the Resource Conservation and Recovery Act were corrected, per our correspondence with Tom Rich.

Having learned that you installed a pressure switch and audible alarm system to indicate lack of water flow through your anodizing line scrubber system, I have made a recommendation to our Permit Unit that Permit to Operate #744-77 be issued to your company.

Please feel free to call this office at 666-2700 if you have questions in these matters.

Sincerely,

John LHR'S

Frederick H. Rieth Resource Specialist Air Quality Division

FIR:mh

Lansing Plant File St. Cla . Metal Products C mpany



SUBSIDIARY OF MECHANICAL TECHNOLOGY, INC. 1721 DOVE STREET PORT HURON, MICHIGAN 48060 (313) 984-5123



July 28, 1982

Department of Natural Resources 2455 N. Williams Lake Road Pontiac, Michigan 48054 Attention: Mr. Fred H. Rieth

RE: Correction of alleged violations of subtitle C of RCRA

Dear Mr. Rieth,

The following actions have been incorporated to correct the alleged violations documented in your report of July 7, 1982.

- 1. Our research lab has indicated that the amount of nickel hydroxide in the nickel hydroxide plus water solution is 30% (± 2%). This is checked daily, as required in 40 CFR 265.13.
- 2. A "Danger-Hazardous Chemicals" sign has been placed on the entrance of the active portion of the facility, as required in 40 CFR 265.14 (2) (c).
- 3. The supervisor who records the weekly inspection of the chemical area has been instructed to also place the time of inspection on his check off list, as required in 40 CFR 265.15 (4) (d).
- 4. A contingency plan has been written to span all emergencies pertaining to the hazardous waste and has been distributed to the proper employees, as detailed in 40 CFR 265.52.
- 5. Operating records have been enacted for all incoming and outgoing nickel hydroxide, as well as daily enteries on in house use, as required in 40 CFR 265.73.
- 6. All required facility records are now available with the completion of numbers one through five of the above, as required in 40 CFR 265.74...
- 7. A facility closure plan has been incorporated whereas the waste chemicals would be purchased by the same Company who is presently servicing us, as required in 40 CFR 265.112.

Kindly let this letter serve as a written record that all of the above actions will eliminate the alleged violations discovered at our facility, and we are now in compliance with the Resource Conservation Recovery Act.

Sincerely, Thomas & Thomas E. Rich

Industrial Relations Manager/Safety Director

DEPARTMENT OF NATURAL RESOURCES AIR QUALITY DIVISION

ACTIVITY REPORT

| | COMPLAINT | NESHAP |
|---|---------------------------------|---------|
| | PERMIT ACTION | NSPS |
| X | ANNUAL COMPLIANCE INVESTIGATION | REVISED |

| AQ-42 | | | 7 /07 | 182 | ? |
|-------------------------------------|-------------|--------------------|--------------------------------------|------|-----------|
| ST. CLAIR METAL PRODUCTS CO. | NO. B-624 | 7 | QUARTER | | NO. |
| NUMBER AND STREET 1721 DOVE ST. | PORT HURO | | STAFF A.STEW | ART | N98 |
| TOM RICH PRIMARY ACTIVITY | PERSONNEL | MGR. | ST. CLAI | R | 74 NO. |
| ACRA INSPECTION | | - in a supplier of | PONTIA | - | 3 |
| FRED RIETH AND I CONDUCTED A | RCRA 01 N | AAJOR S | SOURCE | | |
| INSPECTION IN CONJUNCTION WITH I | ANNUAL 02 A | NINOR S | | | |
| INSPECTION. THIS PLANT USES NICK | 04 1 | RAININ | G – CONFEREN IG | CE | |
| ACETATE IN ITS ANODIZING PROCE | 555. 08 | | Tourist | | |
| THE NICKEL ACETATE IS TREATED TO | FORM 10 | | | | _ |
| A NICKEL HYDROXIDE SLUDGE, WHICH | H 15. 00 0 | THER (| explain) | | |
| PUMPED OUT AND SENT OUT FOR | | | ACTION N POINTS | TYPE | NO. |
| TREATMENT AND DISPOSAL. THE TI | | NVESTI VISIBLE | GATED EMISSION | | |
| MENT AND STORAGE IS DONE IN A | | EVALUA | TION TEST (STAFF) | | |
| INSIDE PLANT. THIS FACILITY IS ALS | 04 5 | SOURCE (COMP | TEST | | |
| CLASSIFIED AS A TRANSPORTER S | 1NCE 06 F | GRAB SA | AMPLE ES TAKEN | | |
| THEY OWN TRUCKS USED TO TRAN | ISPORT 10 | | | | |
| WASTE. SEVERAL DEFICIENCIES WE | RE 11 12 | | | | |
| DISCOVERED INCLUDING LACK OF: A WI | ASTE 13 - | | | | |
| ANALYSIS, WASTE ANALYSIS PLAN, DANG | l a e | | | | _ |
| SIGNS, DATE AND TIME OF INSPECTIONS | 1 17 | | | | |
| INSPECTION LOG, CONTINGENCY PLAN, | 19 | OTHER | levelain | | |
| | | | ANCE STATUS | | |
| OPERATING RECORP, AND CLOSURE PLA | - n | | LIANCE NN COMPLIANC | E | |
| LETTER WAS SENT ASKING THEM TO RE | SPOND c. | OUT OF | COMPLIANCE | | |
| AS TO CORRECTIONS, WITH COPIES TO | D. (| | CHEDULE HEDULE MEET | ING | |
| OHWM AND ADD LANSING. | E. (| | MENTS HEDULE, NOT | | |
| 7 | | MEETI | NG INCREMEN | TS C |) |
| | F. (| KNOW | HEDULE, NOT N IF MEETING MENTS | 10 |) NAK |

DEPARTMENT OF NATURAL RESOURCES AIR QUALITY DIVISION

ACTIVITY REPORT

AQ-42

| COMPLAINT RECEIVED | (NESHA |
|-------------------------------------|---------|
| PERMIT | NSPS |
| ANNUAL COMPLINVESTIGATION COMPLETED | |

| AQ-42 | | | DATE MM/ | DD/YY /82 | |
|--|--|--|--|---|-----|
| ESTABLISHMENT | NO. | | QUARTER | | NO. |
| St. Clair Metal Products | B-624 | 7 | | | 03 |
| NUMBER AND STREET | CITY | | STAFF | | NO. |
| 1721 Dove Street | Port | Huron | Rie | th | 76 |
| CONTACT | TITLE | | COUNTY | | NO. |
| Tom Rich | | | St. Cl | air | 74 |
| PRIMARY ACTIVITY | | | DISTRICT | | NO. |
| REMARKS: | | | Pontia | C | 03 |
| | nona lumanisti | | PROJECT | | |
| Andrea Stewart and I conducted both a and an annual inspection of the anodizing 1 systems. The scrubber system appeared to be normally. All scrubber intake vents from the tanks appeared to have good fume capture. Since Dean Cunningham was unavailable a our inspection, I called him later to determ a pressure switch and audible alarm were even on the scrubber system. The pressure switch | ine scrubber e operating he anodizing at the time of mine whether er installed and alarm | 02 MINO 03 RESIE 04 MEET 05 TRAIN 07 08 09 10 00 OTHE SURVI 01 EMISS INVES 02 VISIBLEVALU 03 SOURG 04 SOURG | R (explain) EY ACTION ION POINTS TIGATED LE EMISSION JATION CE TEST (STAFF) | OURCE ICE 3 — CONFERENCE IG Explain) ACTION TYPE N POINTS SATED EMISSION FION TEST (STAFF) TEST | |
| were installed in early 1981 following notif the company of a violation for operating the line without the scrubbers functioning. Thi | e anodizing | 05 GRAB 06 PICTUI | SAMPLE RES TAKEN | | |
| tested periodically. | | 11 | | | |
| Proced on that information Taill make | | 13 | | | |
| Based on that information, I will make | recommendation | 14 | | | |
| to the Permit Unit to issue Permit to Operat | ce #744-77. | 16 | A. W. Co. L. | ,,, (a) | _ |
| The RCRA inspection revealed some minor | paperwork and | | | | |
| recordkeeping violations that have been corr | rected, accordi | 19 DOD OTHER | (explain) | | |
| to a letter received from Tom Rich. | | | LIANCE STATUS | | |
| First Rioth | | B. UNKNO C. OUT OF ON A D. ON A S INCR E. ON A S | IPLIANCE DWN COMPLIANCE COMPLIANCE SCHEDULE CHEDULE MEET EMENTS CHEDULE, NOT | ING | |

PRODUCED 02/12/82

| | R METAL PRODUCTS CAL TECHNOLOGIES INC | DISTRICT NO. 03 | STAFF T Right & | | NO. 70 |
|----------|---------------------------------------|----------------------|-------------------|----------------|---------------------|
| ANODIZI | NG PLANT DOVE STREET | COUNTY 74 SAINT CLAI | - IUEIL G | Andrea Stewart | NO. 76 |
| PORT HUE | | ESTAB. NO. B6247 | CONTACT TOM RICH | | DATE 7-07-82 |
| DEAN CU | NNINGHAM | | | | |
| * = BIL | LED FOR SCHEDULED INVESTI | GATION | TOTAL TIME, HOURS | PROJECTED TIME | E. HOURS |
| S = SEM | IANNUAL A = ANNUAL B = | BIENNIAL | | IBECORE | |
| | | | | PART. | ESTIMATED EMISSIONS |
| SID | SOURCE NAME | PIECES AVG | HOURLY-RATE CONT | ROLS % EFF | PART. T/Y SO2 T/Y |
| * B 001 | OTHER ACID TANKS | 1 | SCRUBBER | | |
| 002 | OTHER POINT SOURCES | -1 | 1.03 GALS | | |
| 003 | OTHER POINT SOURCES | 1 | 1.71 GALS | | |
| 004 | OTHER POINT SOURCES | 1 | 1.71 GALS | | |
| 005 | OTHER POINT SOURCES | 1 | 1.37 GALS | | |
| 006 | OTHER STORAGE TANK | 1 | 1.83 GALS | | |
| 007 | GENERAL GAS/OIL BLR | 1 | 3.60 MMBT | | .05 |

Conducted RCRA inspection with Andrea in addition to annual inspection of Scrubber stacks. Company chemist explained the anodizing process. Scrubber appeared to be operating normally. Water flow indicator is a light on the control point. All scrubber intake vents on anodizing tanks appeared to capture funes well for exhaust thru scrubbers.

Nickel hydroxide sludge is end waste product that is sent out for treatment & disposal.

No apparent Air violations. Several minor paperwork & record keeping RCRA violations. Company addressed RCRA violations following receipt of deficiency letter.

Called Dean Cunningham 8-2-82 to inquire whether pressure switch & audible alarm were ever installed a scrubber system. They installed a pressure switch which activates a 110 V A.C. alarm in early 1981 the following nutrification of violation for operating anodizing line W/o scrubbers functioning. Alarm is tested periodically FR

2455 N. Williams Lake Road Pontiac, Michigan 48054

July 9, 1982



St. Clair Metal Products Company 1721 Dove Street Port Huron, Michigan 48060

Attention: Mr. Tom Rich

Gentlemen:

On July 7, 1982, staff of the Department of Natural Resources conducted an investigation of your facility located at 1721 Dove Street in Port Huron, Michigan to evaluate compliance of that facility with requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that investigation, staff of the Department of Natural Resources have determined that the above facility is in violation of the requirements of subtitle C of RCRA. Specifically, staff found that:

- A detailed chemical and physical analysis of the waste was not available, nor was a waste analysis plan, as required in 40 CFR 265.13.
- Danger signs must be posted at each entrance to the active portion of the facility, as required in 40 CFR 265.14(2)(c).
- The date and time of inspections must be recorded in the inspection log as required in 40 CFR 265.15 (4)(d).
- 4. No contingency plan was available for inspection as required in 40 CFR 265.53. The written contingency plan should contain information as detailed in 40 CFR 265.52.
- No operating record was available for inspection as required in 40 CFR 265.73.
- All required facility records were not available for inspection as required in 40 CFR 265.74.
- Facility closure plan was not available for inspection as required in 40 CFR 265.112.

We request that you respond to this letter by July 30, 1982 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me at (313) 666-2700.

Sincerely,

Frederick H Roth

Frederick H. Rieth Resource Specialist Air Quality Division

FHR:mh

cc: Al Howard, OHWM

RCRA Inspection Report

| EPA Identification Number: M I I | 09696 | 3 9 1 3 |
|--|-------------------------------|---------------------------|
| | METAL PRODUCTS CO | |
| | STREET | |
| city: PORT HURON | State: MICHIGAN | , |
| Date of inspection: 7/07/82 | Time of inspection (from), | 10:30 A.M. (to) 12:30 P.M |
| Person(s) interviewed | Title | Tel ephone |
| TOM RICH | PERSONNEL DIRECTOR | (313) 984-5123 |
| | • | |
| Inspector(s) FRED RIETH | Agency/Title MDNR-AIR QUALITY | Telephone (313) 666 -2700 |
| ANDREA STEWART | MDNR- AIR QUALITY | (313) 666-2700 |
| Installation Activity (mark only one | box) | Inspection Form(s) |
| Treatment/Storage/Disposal`per 40 Generation and/or Transportation | CFR 265.1 and/or | Α |
| | meration or Transportation) | A |
| ☐ Generation and Transportation | | B, C |
| ☐ Generation only | | В |
| □ Transportation only | | c |
| | | |

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

| Permit | app1 | catio | n process(es) (EPA Form 3510-3) Insp | ection Form | A section(s) |
|------------|-------|-------|---|-------------|--------------|
| | 501 | П | storage in containers | | I |
| * | 502 | X | storage in tanks | | J |
| | T01 | X | treatment in tanks | | J |
| | 504 | П | storage in surface impoundment | | K,F |
| | T02 | П | treatment in surface impoundment | | K,F |
| | D83 | П | disposal in surface impoundment | | K,F |
| | \$03 | П | storage in waste pile | | L |
| | D81 | П | disposal by land application | | M,F |
| | D80 | П | disposal in landfill | | N, F |
| 30 | T03 | П | treatment by incineration | | 0/P |
| | T04 | П | treatment in devices other than tanks impoundments, or incinerators | , surface | Q |
| ther activ | ities | | | | |
| GENE | RATOR | X | | APPENDIX | GN |
| TRANSP | ORTER | M | | APPENDIX | TR |
| | | | | | |

- Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
- 4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

| | | | TES | NO | MIX | Remarks |
|----|----------|---|-----|--------------|-----|---|
| 1. | Ha be | s the Regional Administrator en notified regarding: 265.12 | | | | |
| | a. | Receipt of hazardous waste from a foreign source? | | \checkmark | | NO WASTE RECEIVED FROM FOREIGN SOURCE |
| | b. | Facility expansion? | - | \checkmark | | EXPANSION OF MANUFACTURING AREA ONLY CHANGE IN OWNERSHIP OF |
| | c. | Change of owner or operator? | | \leq | | 20% DF STOCK ONLY |
| 2. | Ger | neral Waste Analysis: 265.13 | | | | |
| | ā. | Has the owner or operator obtained a detailed chemical and physical analysis of the waste? | | <u> </u> | - | |
| | b. | Does the owner or operator have a detailed waste analysis plan on file at the facility? | | <u> </u> | | |
| | C. | Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? | | <u> </u> | _ | • |
| 3. | Sec | urity - Do security measures include (if applicable) 265:14 | 11 | | | |
| | a. | 24-Hour surveillance? | - | X | - | |
| | b. | i. Artificial or natural barrier around facility? and | 1 | | | |
| | | ii. Controlled entry? | / | - | | |
| | C. | Danger sign(s) at entrance? | | 1 | | |
| | Own | er or operator inspections: 265.15 | | | | |
| | a. | Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or | | | | |
| | | the environment? | ✓ | | _ | |

| b. Does the owner have an inspec at the facilit | ction schedule | <u> </u> | <u>\</u> | |
|---|---|----------|----------|---|
| c. If so, does the the inspection items: | ne schedule address n of the following | | | |
| 1. monitoring | g equipment? | <u> </u> | _, | |
| ii. safety and | d emergency equipment? | <u> </u> | | |
| iii. security | devices? | <u> </u> | | |
| iv. operating ment (i.e | and structural equip- . dikes, pumps, etc.)? | <u> </u> | | |
| for durin | roblems to be looked g the inspection (e.g. ting, defective pump, | <u> </u> | | |
| vi. inspection the possi of the eq | n frequency (based upon ble deterioration rate uipment)? | <u> </u> | | |
| d. Are areas sub ed daily when | ject to spills inspect- in use? | <u> </u> | - | |
| an inspection | r or operator maintain log or summary of rator inspections? | <u> </u> | | |
| f. Does the insp following inf | ection log contain the formation: | | | |
| i. the date | and time of the inspection | 7 | - | |
| ii. the name | of the inspector? | <u> </u> | | |
| iii. a notatio made? | on of the observations | <u> </u> | | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |
| iv. the date repairs | and nature of any or remedial actions? | <u> </u> | | |
| o personnel training include: 265.16 | records | | | |
| a. Job titles? | | | | |
| b. Job descript | ions? | | | |

Remarks

YES NO NI

| | | | AF 2 | NO | NI | Remarks | | |
|----|-----|---|--------|-----|--------------|---------|-------------|--|
| | c. | Description of training? | | V | - | | 1.1. 花製料。 | |
| | d. | Records of training? | _ | V | | | | |
| | e. | Did facility personnel receive the required training by 5-19-81? | Page 1 | V | | | • | |
| | f. | Do new personnel receive required training within six months? | | | <u> </u> | NO NEU | U PERSONNEL | |
| | 9. | Do personnel training records indicate that personnel have taken part in an annual review of initital training? | | 1 | | | , | |
| 5. | req | required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265. | | T A | PPLICE | BLE | 4 | |
| | a. | Special handling? | | | <u> </u> | - | | |
| | b. | No smoking signs? | | | \checkmark | 191 | | |
| | C. | Separation and protection from ignition sources? | | | 1 | | | |
| | | | | | | | | |

PREPAREDNESS AND PREVENTION: (Part 265 Subpart C) Section C:

| 1. | Maintenance and Operation of Facility: 265.31 | YES NO | NI | Remarks | |
|----|---|----------------|---------------|-------------------------------|---------|
| | Is there any evidence of fire, explosion, or release of | 1E3 NO | MI | Remarks | |
| | hazardous waste or hazardous waste constituent? | | | 9.1 | |
| 2. | If required, does the facility have the following equipment: 265.32 | | | -1.2 | |
| | a. Internal communications or alarm systems? | 1_ | | | |
| | b. Telephone or 2-way radios at the scene of operations? | | _ | · | |
| | c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? | 1_ | portunitivos. | | |
| | Indicate the volume of water and/or f | oam available | for fi | re control: | |
| | 32 FIRE EXTINGUISHERS | INSTALLED | BY | FIRESAFE | CO. OF |
| | PORT HURON, MI | | | | ÷ |
| 3. | Testing and Maintenance of Emergency Equipment: 265,33 a. Has the owner or operator established testing and maintenance procedures | | | | ٥ |
| | for emergency equipment? | \checkmark — | - | Control of the Control of the | Acres . |
| | b. Is emergency equipment maintained in operable condition? | | | | |
| 4. | Has owner or operator provided immediate access to internal alarms? (if needed) 265.34 | · | | | ; () |
| 5. | Is there adequate aisle space for unobstructed movement? | ✓_ | _ | | |
| 6. | Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility? | <u> </u> | | | |
| | | | | | - |

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

| | | | YES | NO | NI | Remarks |
|-----|-----|---|-----|----|----------|--|
| 1. | | es the Contingency Plan contain the llowing information: 265.52 | | | | 10.7 |
| | ā. | The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to | | | | |
| | | incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) | | _ | <u>✓</u> | NO FORMAL WRITTEN CONTINGENCY PLAN AUAILABLE |
| | b. | Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37? | - | | <u>~</u> | |
| tr. | c. | Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators? | | | 1 | |
| | d. | A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? | _ | | <u> </u> | |
| | ė. | An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?) | | | <u></u> | |
| 2. | ava | copies of the Contingency Plan ilable at the site and local rgency organizations? 265.53 | | / | | |

| | - i | YES | NO | NI | Remarks |
|----|---|-------------------------|----|----------|-------------------------------------|
| 3. | Emergency Coordinator 265.55 | | | | |
| | a. Is the facility Emergency Coordinator identified? | <u> </u> | | | |
| | b. Is coordinator familiar with all aspects of site operation and emergency procedures? | <u>\(\lambda \) \(</u> | | <u> </u> | |
| | c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan? | <u> </u> | | _ | |
| 4. | Emergency Procedures 265.56 | | 14 | | |
| | If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56? | | | | NO EMERGENCY SITUATION HAS OCCURRED |

| | | | | Section E: | MANIF | ST SYSTEM | RECOR | DKEE | PING, | AND R | REPORTING: | (Par | t 265 S | ubpart E) |
|---|----|-------|-------------------|---|--|--|----------|------|-------------------------------|----------|---------------|-----------|------------------------|------------------|
| | | | | 4 | α | | , | YES | NO | NI | Remarks | i | V. 6 | |
| * | 1. | Use | of | Manifest Sy | stem | 265.71 | £ | | | | | | | |
| | | a. | pro (Pa the | es the facil ocedures lis ocessing eac articularly e signed man nerator with livery.) | ted in h mani sending ifest b | §265.71 for fest? g a copy of back to the | - | _ | (transportation) | ¥ | RECEI | UE | DOES WASTE E SOU | FROM. |
| | | b. | | e records of tained for 3 | | | | _ | | <u> </u> | | | | n i |
| * | 2. | requ | uire | ne owner or ements regar pancies? | | nifest | | | _ | 1 | | | | |
| * | of | on-s | ite | able to owne facilities waste from | that do | not | ·. | | | | | | | |
| | 3. | Open | rati | ng Record | 265.73 | | | | | | | | | |
| | | a. | ma i | es the owner intain an op cord as requ 5.73? | erating | | | | 1 | | NO U RECOR | URIT D | TEN C AVAILI | PERATING ABLE |
| | | b. | cor | es the opera ntain the fo formation: | | | | | | | | | | |
| | | | i. | The method of each was storage, o required i Appendix I | ste's t r dispo n 40 CF | reatment, | - | · | _ | <u> </u> | | | | |
| | | | i. | The location in the location is a constant of the location in | dous wa (This cross-r manif | ste withir information eferenced est number | the on . | | | | | | | |
| | | | | if waste w | | ompanied by | _ | | | 1 | | | | |
| | | ***11 | 1. | A map or d cell or di | | | | | | | | | | |
| | | | | _ | | | | | | | | | | |
| | | | | applies to lities | dispos | al | | E-1 | | | | | | 4/82-A |

| | showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) | |
|-----|---|---|
| i | v. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? | |
| | v. Reports detailing all incidents that required implementation of the Contingency Plan? | |
| , | vi. All closure and post closure costs as applicable? | |
| Are | ilability of Records 265.74 all facility records required er 40 CFR Part 265 available for pection? | |
| à. | Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper? | FACILITY DOES NOT RECEIVE WASTE FROM OFF-SITE SOURCES |
| ь. | If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment. | · · · · · · · · · · · · · · · · · · · |

YES NO

NI

Remarks

^{**} Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks 1. Closure 265.112 a. Is the facility closure plan available for inspection? b. Does the plan identify: maximum extent unclosed during facility life? maximum hazardous waste inventory? iv. estimated year of closure? v. schedule of closure activities? c. Has closure begun? Post-Closure 265.118 FACILITY IS NOT A a. Is the post-closure plan available for inspection? DISPOSAL FACILIT b. Does this plan contain: description of groundwater monitoring activities and frequencies? description of maintenance activities and frequencies for AA. integrity of cap, final cover, or containment structures, where applicable BB. facility monitoring equipment name, address, and phone number, of person or office to contact during post-closure care period? c. Has the post-closure period begun? d. Is the written post-closure cost estimate available? 265.144

^{*}Applies only to disposal facilities.

Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

| 1. | Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 | | . = (|
|----|---|-------------------|--|
| 2. | Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures? | | |
| 3. | Do continuous feed systems have a waste-feed cutoff? | / No | CONTINUOUS FEED SYSTEM |
| 4. | Are waste analyses done before the tanks are used to store a substantially different waste than before? | | TANKS NOT USED TO STORE DIFFERENT WASTES |
| 5. | Are required daily and weekly inspections done? 265.194 | | |
| 6. | Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | <u> </u> | WASTE NOT IGNITABLE OR REACTIVE |
| 7. | Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.) | | |
| 8. | Has the owner or operator observed the National Fi buffer zone requirements for tanks containing ign | ire Proteitable o | ection Associations NOT r reactive wastes? APPLICABLE |
| | Tank capacity:gallons | | |
| | Tank diameter:feet | - 1 | |
| | Distance of tank from property line | | feet |
| | (See table 2 - 1 through 2 - 6 of NFPA's "Flamm Code - 1977" to determine compliance.) | mable an | d Combustible Liquids |

| | | n |
|----------|------|-------|
| Section | 11 - | Scope |
| 20001011 | (1) | 36000 |

tor.

 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

| | | | YES | NO | NI | Remarks |
|-----|-------------------|---|----------|------|--------|--|
| (1) | Doe | es the operator have copies of the manifest ailable for review? 262.40 | 1 | | | (management of the state of the |
| (2) | mon | amine manifests for shipments in past 6 nths. Indicate approximate number of hifested shipments during that period. | 2 | | à | |
| (3) | fol cop fes | the manifest forms examined contain the llowing information: (If possible, make pies of, or record information from, manist(s) that do not contain the critical ements). 262.21 | | | | 5. |
| | a. | Manifest document number? | 1 | _ | | |
| | b. | Name, mailing address, telephone number, and EPA ID number of Generator | 1 | | | |
| | c. | Name and EPA ID Number of Transporter(s)? | 1 | | | |
| | d, | Name, address, and EPA ID Number Designated permitted facility and alternate facility? | 1 | | | |
| | e. | The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? | <u> </u> | | | |
| | f. | The total quantity of waste(s) and the type and number of containers loaded? | <u> </u> | | | ** |
| | g. | Required certification? | 1 | | | |
| | h. | Required signatures? | 1 | | | |
| 4) | Rep | ortable exceptions 262.42 | | | 4 | |
| | a. | For manifests examined in (2) (except for signer the number of manifests for which the signed copy from the designated facility with | gener | ator | has NO | T received a |

4/82-A

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administra-

| 260 | tion C: PRE-TRANSPORT REQUIREMENTS (Part 202, S | | | | |
|-----|---|-----------------------------------|-------------------------|-------------------|---|
| 1. | Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30 | YES | NO - | NI — | Remark s |
| 2. | Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32 | | | | |
| 3. | If required, are placards available to transporters of hazardous waste? 262.33 | 1 | _ | _ | |
| 4. | On-site accumulation of generated hazardous was waste it generates either (A) in its storage fawith 40 CFR 262.34 [see 265.1(c)(7)]. Option 6 and containers. If the installation elects option 5 Section D. If the installation elects options: See 40 CFR 262.34 January 11, 1982 Rev | acility B restriction A, on B, co | [265. cts a check | l(b)] ill ac this | or (B) in accordance cumulation to tanks box and skip |
| | a. Is each container clearly marked with the start of accumulation date? | | | | |
| | b. Have more than 90 days elapsed since the date inspected in (a)? | - | | _ | |
| | c. Do wastes remain in accumulation tanks for more than 90 days? | | | | |
| | d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"? | | | - | |
| Sec | tion D: - RECORDKEEPING AND REPORTING (Part 262, | Subpar | t D) | | |
| 1. | Are all test results and analyses needed for hazardous waste determinations; retained for at least three years? 262.40 | YES | NO . | NI | Remarks |
| Sec | tion E: - INTERNATIONAL SHIPMENTS (Part 262, Sul | bpart E |) | | |
| 1. | Has the installation imported or exported Hazardous Waste? 262.50 | | 1 | / | · · · · · · · · · · · · · · · · · · · |
| | (If answered Yes, complete the following as applicable.) | | | | |
| | Exporting Hazardous waste; has a generator: | | | | |

Appendix TR

| tion A. SCOPF. | YES | NO | NI | Remarks | |
|--|--|--|---|--|---|
| CTON A. SCOPE. | | | | ` | |
| Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10. | <u>\</u> | | | | |
| Does the transporter transport hazardous waste into the U.S. from abroad? | | V | | # 14 (characteristics) | |
| Does the transporter transport hazardous waste out from the U.S.? | | 1 | | | |
| Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? | | 1 | _ | | - |
| tion B: MANIFEST SYSTEM AND RECORDKEEPING | (Part | 263, | Sub | opart B) | |
| Are copies of <u>completed</u> manifests available for <u>review</u> and retained for three years. 263.22 | _ | _ | | | |
| Estimate the number of manifests for shipments completed during the part 6 months. | 6 | | | · | |
| Examine a representative number of manifests. Indicate number examined. | 6 | · | | | |
| Did transporter properly sign and date the manifests examined? | 1 | | _ | · · · · · · · · · · · · · · · · · · · | |
| Do any manifests indicate shipments delivered to other than the designated facility? 263.21 | | _ | - | | |
| If (5) is "no," skip 6 and 7. | | | - | | |
| Do any manifests indicate shipments delivered to other than an alternate facility? | | | | | |
| Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility? | | | | | |
| | operator transports hazardous waste subject to 40 CFR 263.10. Does the transporter transport hazardous waste into the U.S. from abroad? Does the transporter transport hazardous waste out from the U.S.? Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? tion B: MANIFEST SYSTEM AND RECORDKEEPING Are copies of completed manifests available for review and retained for three years. 263.22 Estimate the number of manifests for shipments completed during the part 6 months. Examine a representative number of manifests. Indicate number examined. Did transporter properly sign and date the manifests examined? Do any manifests indicate shipments delivered to other than the designated facility? 263.21 If (5) is "no," skip 6 and 7. Do any manifests indicate shipments delivered to other than an alternate facility? 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(FR)

St. Clair Metal Products Company

RECEIVED

1721 DOVE STREET . PORT HURON, MICHIGAN 48060 . (313) 984-5123

FEB 9 1981

AIR QUALITY DIVISION



06, February, 1981

Mr. Frederick H. Rieth, Resource Spec. Air Quality Divison Department Of Natural Resources 2455 N. Williams Lake Rd. Pontiac, Michigan 48054

Dear Sir:

In reply to your letter dated February 04, 1981. Per our discussion on January 29, 1981, at which time I stated that the scrubbers would be operating within five days, the scrubbers were made operational on February 05, 1981.

The scrubbers were not operating during your inspection due to a water tank leak and were in process of repair. Since I was unaware of the requirement to notify by 9:00 A. M. of the day following malfunction, no notice had been given. Having now been made aware of the rule, any future malfunctions will be so handled.

Sincerely,

Dean Cunningham

Engineer

ST. CLAIR METAL PRODUCTS CO.

DC/las

ecidancing o



NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
E. M. LAITALA
HILARY F. SNELE
PAUL H. WENDLER
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

2455 N. Williams Lake Road Pontiac, Michigan 48054

February 4, 1981

Mr. Dean Cunningham St. Clair Metal Products 1721 Dove Street Port Huron, Michigan 48060

Dear Sir:

On January 29, 1981 Mr. Kevin Tolliver and I conducted an annual investigation of your anodizing line and scrubbers to determine their status of compliance with the Michigan Air Pollution Control Rules. At the time of our visit the scrubbers were not in operation due to a problem with the water recirculation system. You are hereby informed that you are in violation of Rule 910 which states that: An air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law. You are also in violation of Condition #11 of your Permit to Install #744-77 which requires that this office be notified of malfunctions of process or control equipment by 9:00 A.M. of the next working day. Permit violations constitute a misdemeanor which can subject the responsible party to substantial fines. Therefore, within 10 days of receipt of this letter please submit to this office in writing an explanation of the reasons for the scrubbers not being used, and include the date by which the scrubbers will be back in use. Once the scrubbers are back on line, Mr. Tolliver will make a return visit to evaluate Permit #744-77 for a Permit to Operate.

I also entered the following pieces of equipment in our emission inventory system: the three acid storage tanks, the sodium hydroxide tanks, the oil storage tank, and the 100 µp process boiler. In the future you will be required to report use of this equipment in the Fall of each year so that emissions from these sources may be calculated.

We also discussed your intention to install a Polyvinyl Chloride extrusion line. Please be advised that you must obtain an approved Permit to Install this equipment prior to commencing actual installation. Failure to obtain the required permit is also a misdemeanor and subjects the responsible party to substantial fines. I have enclosed a permit application for your use. Should you have questions regarding the hazardous aspects of the

polyvinyl chloride, you may contact Mr. John Shaffer of our Hazardous Materials Section in Lansing at 517-322-1339.

Please feel free to contact this office at 666-2700 should you have questions or require assistance on these or other matters related to air quality.

Sincerely,

FB

Frederick H. Rieth Resource Specialist Air Quality Division

KLT:mh

Enclosure

cc: Kevin Tolliver

#B-6247

DEPARTMENT OF NATURAL RE RCES

ACTIVITY REPORT

| | COMPLAINT RECEIVED | | NESHAP |
|---|---|----|---------|
| | PERMIT | | NSPS |
| X | ANNUAL COMPLIAN INVESTIGATION COMPLETED | CE | REVISED |

| AQ-42 | COMPLETED | | DATE MM/ | DD/YY | |
|---|-----------------|-------------|-----------------------------|----------|-----------|
| - Pg lof Z- | | | 01-29 | | |
| ESTABLISHMENT OLL TO A L | NO. | 1.50 | QUARTER | | NO. |
| St Clair Metal Products NUMBER AND STREET | B-67 | 247 | FIRST | | 1 |
| 1721 Dove St. | D -L II | | STAFF | | NO. |
| CONTACT | Port Ho | won | COUNTY | Н | 76 No. |
| Dean Cunningham PRIMARY ACTIVITY | Plant E | | ST CLAIR | 2 | 74 |
| PRIMARY ACTIVITY | | J | DISTRICT | | NO. |
| REMARKS: | | | PONTIA | 2 | 03 |
| Visited company with Kevin Tolliver to cond | 4 | | PROJECT | | 100 |
| - William Condand City Learn 10 Cond | eicl annuar | | SOURCE | | 05 |
| and to evaluate anodizing line \$ 2 wet some | blers | 02 MINOR | SOURCE | | |
| 77 | | | IG – CONFERE | NCE | |
| covered by Pto I # 744- for Pto O. | | 05 TRAINI | | | |
| The Company has 2 scrubbers to provide for | m. H. stins | 07 | | | |
| The sample of the same of the | national was- | 08 | | | |
| if one is down the other can do the job. On the | day of our | 10 | - | | - |
| | | 00 OTHER | (explain) | | |
| Visit neither scrubber was operating due to a p | | | | 12 | _ |
| the scrubberwater recirculating tank. This to | ule had bear | | ACTION | TYPE | NO. |
| | | 61 EMISSIC | N POINTS IGATED | 01 | 02 |
| removed from the building for kpairs. Mr Cum | iningham said | 02 VISIBLE | EMISSION | | |
| it would be back in & scrubbers on line within aw | | FVALUE | ATION | | |
| want or cacic in & scrawers on the within aw | eck or 10 days. | | TEST (STAFF) | | |
| In the interior; they have switched to a process that | emits only | 04 SOURCE | | \vdash | |
| | / | 05 GRAB SA | AMPLE | | |
| dilute nitric acid. Condition # 11 of Permit | | 06 PICTURE | STAKEN | | |
| was violated because we were not notified of the | problem. | 10 | | | |
| We learned of the existinge of the following | unreported | 11 | | | |
| EI sources: (1) 3,000 gallon H3 POy tank , each | dus filed | 13 | | | _ |
| (1) 5,000 gallon 440, + 1 5 3 | | 14 | 184 | | - |
| HIVO3 TAME | or 4 times | 16 | | | = |
| ()5,000 gallon Hz.Soy U | n 1980 | 17 | | | |
| 12,000 gallon 50% Na UH tank | | 18 | | | - |
| | | 00 OTHER (| explain) | | |
| 16,000 gallon # 2 oil storage tank - used. | for back-up | A. IN COMP | ANCE STATUS | | |
| | | | IN COMPLIANC | E | |
| fuel for process boiler which normally runs on 9 | | | COMPLIANCE N | | |
| 100 hp gas-oil Goiler for process heat | | | CHEDULE | | |
| | | INCREA | IEDULE MEETI | NG | |
| Entered these sources in EI system. Drafted lett | ter to company | E. ON A SCH | EDULE, NOT | 6 |) |
| forming them of compliance status. | | | IG INCREMENȚ IEDULE, NOT | S VO | yeary |
| | 1. 1. 1 | | IF MEETING | " My | |
| Mr Cunningham also mentionned the comp | any intends | INCREM | MENTS | May | |

DEPARTMENT OF NATURAL REL RCES AIR QUALITY DIVISION

| COMPLAINT | | NESHAP |
|------------------|-----|-------------------|
| PERMIT ACTION | | NSPS |
| ANNUAL COMPLIANC | E _ | REVISED STATUS |

| ACTIVITY REPORT | ANNUAL COMPLIANCE INVESTIGATION COMPLETED | REVISED STATUS | |
|--|---|--|---|
| AQ-42 - PS Zof Z- | | DATE MM/DI | |
| ESTABLISHMENT | NO. | QUARTER | No. |
| St Clair Metal Products | B-6247 | | |
| NUMBER AND STREET | CITY | STAFF | NO. |
| CONTACT | TITLE | COUNTY | NO, |
| PRIMARY ACTIVITY | | DISTRICT | NO. |
| REMARKS: | | PROJECT | |
| to install a PVC plastics extrusion li | re Sometime OI N | IAJOR SOURCE | |
| | 02 M | IINOR SOURCE | |
| in 1981. I suggested they submit their | Pernit 03 R | ESIDENCE | |
| application (s) immediately. Will include | perint 04 M | IEETING – CONFEREN RAINING | ICE |
| applications with my letter and and interesting i | 07 | | |
| John Shaffer's phone # in case toxicity in | 00 | | |
| | | THER (explain) | |
| When filing application. | | URVEY ACTION | TYPE NO. |
| Kevin Tolliver will visit company again st | hortly to 01 E | MISSION POINTS | |
| evaluate anodizing line & scrubbers for Pt. | a O when 02 V | ISIBLE EMISSION VALUATION | -11- |
| scrubbers are functioning. | | OURCE TEST (STAFF) | |
| as out of the state of the stat | 04 50 | OURCE TEST (COMPANY) | |
| | 05 G | RAB SAMPLE | |
| | | ICTURES TAKEN | |
| | 09 _ | | |
| | 10 - | | |
| | 12 | | |
| | 13 _ | a final i _{n 197} | |
| | 14 | | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |
| | 15 _ | W | .,- |
| | 17 _ | | |
| | 18 | | |
| | 19 00 0 | THER (explain) | |
| | | COMPLIANCE STATUS | |
| | A. IN | COMPLIANCE | |
| | | NKNOWN COMPLIANC | |
| | | UT OF COMPLIANCE N | IOT |
| | | ON A SCHEDULE N A SCHEDULE MEET | ING |
| | | INCREMENTS | |
| | | N A SCHEDULE, NOT MEETING INCREMENT | rs (m) |
| | | N A SCHEDULE, NOT | at 1 |
| | | KNOWN IF MEETING INCREMENTS | Many |

PAGE 1562

PRODUCED 02/08/80

| ST | CL | A | I | 2 | ME | T | AL | P | 20 | DOL | C | TS | | |
|-----|-----|---|-----|-----|-----|---|-----|----|-----|-----|---|----|-----|--|
| MEC | HA | N | 71 | CA | L | T | Eξ | HA | IOL | 00 | I | ES | INC | |
| ANC | DI | Z | I | VG | F | L | AN | T | | | | | | |
| | 17 | 2 | 1 | D | OV | E | S | TH | EE | T | | | | |
| POR | T | H | UI | 30 | N | | | | | | | 48 | 060 | |
| DER | 1.i | - | 111 | 161 | 7.8 | c | - A | M | | | | | | |

DISTRICT NO. 03 COUNTY 74 SAINT CLAIR

F Rieth

------ CONTROLS

ESTAB. NO. 86247

Dean Cunningham

18-PS-10 3TAD

BILLED FOR SCHEDULED INVESTIGATION S = SEMIANNUAL A = ANNUAL B = BIENNIAL

TOTAL TIME, HOURS

SID --- SOURCE NAME ---a 8 001 OTHER ACID TANKS

AVG .- HOURLY - RATE PIECES

SCRUBBER

% EFF PART. T/Y

Anodizing operation

3 acid tanks not on EI

3000 gallon - H3 PO4 } each was filled 30+4 5000 gallon - H2504 I times in 1980

12,000 gallon 50% Na OH tank

16,000 gallon #2 oil storage tank for back-up boiler fuel. Boiler runs on gas. (100 hp) Boiler used for process heat only.

Company considering installing Duc plastic extrusion line. Supply permit apps & John Shaffers home Et.

Scrubbers not operational due to problem with scrubber water recirculation tank. Company still operating, but using process that emits only H20 and delute HNO3. Water tank was removed for repaire, will be installed again within a week.

Ports washer = 10% solution Borax & sodium bicarbonate - not a source.

(2)

PRODUCED 02/07/19

| ST CLAIR METAL PRODUCTS MECHANICAL TECHNOLOGIES INC | DISTRICT NO. 03 | STAFF | NO. |
|--|---|--------------------------|---|
| ANODIZING PLANT 1721 DOVE STREET | COUNTY 74 SAINT CLAIR | | *************************************** |
| PORT HURON 48060 | ESTAB. NO. 66247 | CONTACT | DATE |
| DEAN CUNNINGHAM | 400000000000000000000000000000000000000 | | ******** |
| * = BILLED FOR SCHEDULED INVEST | | TOTAL TIME, HOURS PROJEC | TED TIME, HOURS |
| S = SEMIANNUAL A = ANNUAL B = | BIENNIAL | ******* | ********** |
| Las Stranda de la la la la la la la la la la la la la | | | PART. ESTIMATED EMISSIONS |
| SID SOURCE NAME | PIECES AVGHOURL | YERATE CONTROLS | Z EFF PART. T/Y SOZ T/Y |
| # 9 001 OTHER ACID TANKS | 1 | SCRUBBER | |
| 002 SPRAY OTHER COATINGS | 2 | FAB-FILTR | |

2 somblers 1 is tack-up.

Perel 74-1-77 2 TK on west services - 10000 FR

100 hp Goiler gasfoil

16,000 gal fuelon I for stand by

isto Borax & Sodium bicarb washer.

Permit for PVG - Low contact with letter & permit applic.

Vented Nitric Acid 80% Salfuric Acid 98%

filled 3-4 times

20,000 gallon acid reclaim tank

DEPARTMENT OF NATURAL DURCES AIR QUALITY DIVISION

ACTIVITY REPORT

| COMPLAINT | NESHAP |
|-------------------|---------|
| PERMIT ACTION | NSPS |
| ANNUAL COMPLIANCE | REVISED |

| LINV | YESTIGATION MPLETED | REVISED STATUS | |
|--|---------------------|-------------------------|--|
| AQ-42 | | DATE MM/DD/Y | |
| ESTABLISHMENT | | 01- 25 | 3-61 |
| | NO.B-6247 | QUARTER | NO, |
| ST. CLAR METAL PRODUCTS | 10 02 T | FIRST | 01 |
| 1721 Dove | 0.11 | STAFF | NO. |
| CONTACT | PURT HURON | COLLIVER | 9. |
| DEAD CUDNINGHAM | FARD | | 2 No. |
| PRIMARY ACTIVITY | LUR | DISTRICT | NO. |
| RE: # 744-7 | 77 | PONTIAL | 0 |
| REMARKS: | | PROJECT | + |
| | 01 MA. | OR SOURCE | 00 |
| TIPIL IT IN I | (D2 MIN | OR SOURCE | - |
| tred Rieth and I spoke with M | 1722 | IDENCE | |
| | 04 1155 | TING - CONFERENCE | |
| Convergham regarding Application ? | 44-11 | INING | |
| which correctly has a Permit to los | 1 1 07 | - TO 197 | |
| which correctly has a Permit to Ins | tall 08 _ | | |
| two net scrubbers. | 09 | | |
| 7.65 WET 30.10866 62. | 10 | | |
| These scrubbers have been in operat | HTO OTH | ER (explain) | |
| | | VEY ACTION TYP | E NO. |
| tor controlling the emissions from the | EIR OI EMIS | SION POINTS | |
| annodizing live but agent operation | 1. 1 | STIGATED | 15 |
| 1 2 111 | | BLE EMISSION LUATION | |
| because of a breakdown in their w | ater 03 sour | RCE TEST (STAFF) | - |
| | | RCE TEST | |
| Recipculation unit. | | MPANY) | 1 |
| T - 00 1 | 05 GRAI | SAMPLE | |
| They are continuing to run however | 06 PICT | JRES TAKEN | |
| and dilute nitric acid is emitted | From 109 | | - |
| their stack. The scrubbers are expec | tal 1 11 | | |
| | 12 | | |
| be repaired next week. | 14 | 1945c | |
| Operating the system without notify | 15 | 44 | _ |
| dia D. til Die I I II It | J. 17 | | - |
| the Quality Division about the malfor | inction 18 | | _ |
| is a violation of their Permit | 19 00 OTHE | R (explain) | |
| | | PLIANCE STATUS | |
| Condition 11. | | MPLIANCE | |
| To the state of th | | OWN COMPLIANCE | |
| Fred Kieth entered their gas/oil | | F COMPLIANCE NOT | |
| 1 11. 11 11 11 | ONA | SCHEDULE | |
| nd three acid stopage tanks int | | SCHEDULE MEETING | |
| < // | | REMENTS | 7 |
| Suveillance system. | | SCHEDULE, NOT | 200 |
| | | TING INCREMENTS | 1 |
| | | CHEDULE, NOT | . ast |
| | | WN IF MEETING | THE STATE OF THE S |

R5642 3/77 File

AQ-20 COUPMENT IDENTIFICATION

DO MOY DUPLICATE 1978 COMPUTER

ESTABLISHMENT NUMBER

86247

DAR USE ONLY - INITIALS, DATE DNR USE ONLY - ACTION PRINTED INFORMATION IF CORRECT Instructions NEW CHANGE DELETE O.K. n Reverse Side FOR 1970, ENTER ONLY 10 20 45 COMPECTIONS OF ADDITIONS. 1978 DATA 1979 DATA ITEM The printed data is information currently in our files. Report data for the 1979 calendar year. If this equipment 1 was never operated during 1979 and its permanently discon-Use the data as reference in filling out the form. tinued then check this box A. SOURCE IDENTIFICATION NUMBER ITEM 002 111 51 01 010 2 B. EQUIPMENT NAME OR DESCRIPTION 12-44 []]]]]] (AS YOU REFER TO IT) PAINT SPRAY BOOTHS MIPMENT C. EQUIPMENT CODE (SEE TABLE V) SCRIPTION (SEE VOC INSTRUCTION SHEET) 0049 32 1 1 1 1 135 D. TOTAL NUMBER OF IDENTICAL UNITS 36 - 1 - 1 - 1 38 (IF OTHER THAN ONE, SEE INSTRUCTIONS) E. OPERATING SCHEDULE (YEARLY AVERAGE) 39L_L_I40HOURS/DAY JUL-SEP OCT-DEC 1 HOURS/DAY 1 DAYS/YEAR F. OPERATING SCHEDULE (PERCENT BY QUARTER) APR-JUN JAN-MAR FIAM-WAL APR-JUN JULISEP OCT-DEC 25 % 25 % NIT CODES G. RATED CAPACITY (PER HOUR) OR SIZE OF EACH UNIT FOR S G. AND H. UNIT CODE AMOUNT NUNDS 56 1 1 1 1 1 1 1 1 64 651 1 0.00 INS H. MATERIAL PROCESSED (PER YEAR) SEE TABLE V. TOTAL AMOUNT UND CODE OO CU. FT. J. YARDS TOTAL AMOUNT UMIT CODE ALLONS 0,0 OD BARRELS 1. EMISSION CONTROL EQUIPMENT CODES (SEE TABLE IV) ILLION BTIJ 76 177 73 1 179 80 1 181 10 00 J. AVERAGE OVERALL PARTICULATE COLLECTION EFFICIENCY, IF KNOWN K. AVERAGE PERCENT OF VOLATILES (BY VOLUME) FOR COATING OPERATIONS ONLY (SEE TABLE V, EQUIP. CODES 1045-1141) 1 1 1 1 1% 0.00 A. NATURAL GAS ITEM L L L L L 1000 CUBIC FEET/YEAR 1000 CUBIC FEET/YEAR 3 B. DISTILLATE OIL NO. 1 THRU NO. 4 1000 GALLONS/YEAR FUEL USED 105 1 1 1 1 1% 0.00 % SULFUR TO C. RESIDUAL OIL PERATE 108 L.L.J. J. J. J. J. J. 1000 GALLONS/YEAR NO, 6 AND NO. 6 0 1000 GALLONS/YEAR UIPMENT JITEM 2 117 - 1 - 1 - 1% 0.00 % SULFUR D. WOOD OR BARK 120 L L L L L TONS/YEAR TONS/YEAR E. COAL OR COKE 129 L. L. L. L. L. L. TONS/YEAR TONS/YEAR 138 1 1 1 1% 0.00 % SULFUR 0.00 % ASH F. OTHER (SPECIFY TYPE) AMOUNT (Specify Units) 154 L_1 + L_195 0.00 % SULFUR 0.00 15/L_1_1 & L__ 1 % % ASH 1 8/79

ST CLAIR METAL PRODUCT

| | | A A TANK A COLUMN A C | | |
|--|--|--|------------|--|
| Z59055- 1661 C3/04/79 | MICHIGAN EEPARTA | MENT OF NATURAL RESOURCES | | PAGE 1 |
| | REPERT OF AN | JALITY DIVISION NAUAL INVESTIGATIONS | | |
| ST CLAIR METAL PRODUCTS | CISTRICT AC 03 | | . 1 1. | |
| MECHANICAL TECHNOLOGIES IN ANODIZING FLANT | C | STAFF TOWN | 7-1/ taki- | |
| 1721 DEVE STREET | CCUNTY 74 SAINT CLAIR | | | |
| DEAN CUNNINGHAM 48060 | ESTAB. NC. 26247 | CENTACT PONCO | Mindle | DATE (0-22-79 |
| # = BILLED FOR SCHEDULED I | 984-5123 | | 37105-1- | |
| S = SEMIANNUAL A = ANNUAL | NVESTIGATION B = BIANNUAL | TOTAL TIME, HOURS | PROJECTE | TIME, HOURS |
| | | | | |
| SID SCURCE NAME - | PIECES AVGHOURLY | Y-RATE CENTE | ROIS | ART. ESTIMATED EMISSIONS EFF PART. T/Y SOZ T/Y |
| * B CCI CTER ACTO TANKS | | SCRUBBER | | |
| COZ SPRAY CTHER COATIL | vgs | FAB-FILTR | | |
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| | The state of the s | 1000 | | and the process of the contract of the contrac |
| D 11 3/1/ | [| | | |
| teamit 14 | 1-71 - condition - | REDURIND AUdil | nle Alana | |
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| Cunnington | Will ADD PRESSURES | wich & Alarm. | | TIS DONE |
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| Peronne | Will ADD PRESSURES | wich & Alarm. | | |

DEPARTMENT OF NATURAL RESOURCES AIR QUALITY DIVISION

ACTIVITY REPORT

| | COMPLAIN (| NESHAP |
|---|------------------------------------|-------------------|
| | PERMIT ACTION | NSPS |
| X | ANNUAL COMPLIANCE INVESTIGATION | REVISED STATUS |

| AQ-42 | CETED | DATE MM/DI | -76 -76 |
|--|--|---|-------------|
| ST CLAIR MENT PRODUCTS CO. | NO.B-6247 | QUARTER | 3 |
| NUMBER AND STREET 1721 DOU€ ST | POTET HURON | STAFF NAK | NO. |
| DEAN CUNNINGHAN | TITLE | STUDIO | 774 |
| ALUCTINUM ANODIZING | | - OSTRICK | _ 103 |
| Arral inspection of operations. | | PROJECT OR SOURCE OR SOURCE | 02 |
| New screllows installed & operation well (peront# 744. They are installed in parallel are one scrubby should go | 03 RES 04 MEE 05 TRA 07 — 08 — 09 — 10 | IDENCE TING – CONFEREN INING | ICE |
| Down, other will HANDLE EN | TR | ER (explain) | Inune I via |
| EXHAUST. FACH SCIENDSON HE | 15 01 EMIS | VEY ACTION SSION POINTS ESTIGATED | TYPE NO. |
| TO DISEVENT BACKDEAFTING. | EVA | BLE EMISSION LUATION RCE TEST (STAFF) | |
| Nices Designer system. | 04 SOU | RCE TEST DMPANY) | |
| CUNNINGHAM Will ADP | | B SAMPLE URES TAKEN | |
| PRESSURE SWICH IN SERVIN | 10 = | | |
| with condition #13. This w | 13 | | |
| Activate ALARM if FON is | ON 16 | | |
| BUT WATER PRESSURE OFF. THE | TEY 17 _ | | |
| PRESENTLY HAVE INDICATO | | ER (explain) | |
| "ON & OFF". | HOAS A. INC | MPLIANCE STATUS OMPLIANCE NOWN COMPLIANC OF COMPLIANCE | |
| T.Ma | D. ON A ING | A SCHEDULE A SCHEDULE MEETI CREMENTS A SCHEDULE, NOT SETING INCREMENT | ING |
| | F. ON A | A SCHEDULE, NOT OWN IF MEETING CREMENTS | 05842 |

ST CLAIR METAL PRODUCTS MARCH 8, 1978



SCRUBBER INSTALLATION ON PERMIT# 744-77

4x TELEPHOTO

T. Marki

MICHIGA DEPARTMENT OF NATURAL ESOURCES

INTEROFFICE COMMUNICATION

November 18, 1977

To: Rick Johns

From: Tom Maki

Subject: Permit Application from St. Clair Metal Products, Port Huron

On November 15 I met with Dean Cunningham of St. Clair Metal Products to discuss a proposed scrubber installation on their existing anodizing line. I received the attached application from him at the meeting. The site is fine- it is in an industrial park and there is no existing problem with the present operation. The application is recommended for a Permit to Install

Lom

DEPARTMENT OF NATU _ RESOURCES AIR QUALITY DIVISION

ACTIVITY REPORT

| | COMPLAINT | NESHAP | |
|---|-------------------|---------|--|
| X | PERMIT ACTION | NSPS | |
| X | ANNUAL COMPLIANCE | REVISED | |

| AQ-42 | MPLETED | | STATUS | | |
|--|------------|---|--|-------|-----------|
| | | | | D/YY | 7 |
| ESTABLISHMENT ST CLAIR METAL PRODUCTS | NO. | | QUARTER | | NO. |
| NUMBER AND STREET | -etzy L | | STAFF | | NO. |
| 1721 DOVEST | TITLE | Rox | COUNTY | | 17 No. |
| PRIMARY ACTIVITY | TORGINE | E2 | STELON, DISTRICT | 2_ | 7L |
| FNODIZING HUGGINUM GUTO TE | in | | PONTA | | NO. |
| | AT O | a solution of | ROJECT | | 0 |
| His REQUEST TO DISCUSS THE | in O | MINOR S | OURCE | | |
| | 0 | 4 MEETING | G - CONFEREN | NCE | |
| 1. 0 | 0 | Commercial | G | | |
| EXISTING ANODIZING LINE. HE | => 0: | _ | | - | |
| will use a paraLLEL ARRANO | reman 1 | | | | |
| OF TWO 121-MER F-5-6 SC | zubbers of | OTHER (| explain) | | |
| ON ONE EXHAUST STACK | (0) | SURVEY | | TYPE | |
| | | INVESTIC | SATED | 01 | 2 |
| Butterry | | EVALUA | TION | | |
| SCTUR SCTUR | 03 | SOURCE | | | |
| | 0F | (COMPA | | | |
| | 06 | PICTURES | A CONTRACTOR OF THE PARTY OF TH | | |
| | | | | | |
| Tank | | _ | | | |
| | 13 | | | | |
| I RECEIVED THE Application | .) 15 | | | | |
| | 16 | | | TYRS | |
| | 18 | - | | - | - |
| VISITO SITE & PROPOSED EN | liberan 00 | | kplain) NCE STATUS | - | |
| JOOK OK. NO EXISTING PIZOR | lem: A. | IN COMPL | IANCE | | |
| RECOMMENCED FOR PESCONT TOU | wsall. c. | | OMPLIANCE N | | |
| Company may MODIFY THE | ±02 n | ON A SCH | HEDULE EDULE MEETII | VG. | |
| DAINT BOOKS, Which ARE NOT | noina | INCREM | ENTS | | |
| I SO TE VIDE THE | - 1 | MEETING | EDULE, NOT GINCREMENTS | S | -1 |
| 3 10 15 | F. | | EDULE, NOT | | |
| 300017 Permit application | | INCREM | ENTS | R5642 | , |
| , , , | | | | 3/77 | |

Reply to: 2455 N. Williams Lake Road Pontiac, Michigan 48054

March 8, 1977

St. Clair Metal Products 1721 Dove Port Huron, Michigan 48060

Attention: Mr. Dean Cunningham

Dear Mr. Cunningham:

On February 14, 1977, I conducted this Division's initial surveillance inspection of your manufacturing facilities. The plant should not have any difficulty meeting the Michigan Air Pollution emission limits.

St. Clair Metal Products has an anodizing process in operation. Simple scrubbers are normally satisfactory in this application. Your scrubber was not operating properly during my inspection. I understand that this unit will be repaired or replaced promptly.

Within the enclosed Rules booklet, Rules 21 through 36 describe the Michigan Air Use Permit System which applies to many manufacturing processes and pollution control equipment. These rules became effective in late 1967, and all qualifying equipment installed since that date should be covered by a Permit.

If the existing anodizing line and existing scrubber were installed after 1967, they both need a Permit, but may be included on the same AP-1 application form. The form should be completed and returned as soon as possible.

A second AP-1 form is enclosed for your anticipated future use. If a new scrubber or polluting process is installed, each project would require a new application.

The larger booklet and allied AQ-10 and AQ-20 forms pertain to the annual emission inventory system. Do not be concerned about the November, 1976 deadline. Just return the completed forms promptly. Your firm will be entered into our files for processing in subsequent years.

Thank you for your cooperation. If you need assistance, please contact this Pontiac district office at 666-2700.

Sincerely,

Jack Larsen, Engineer Air Quality Division

JL: aah

Enclosures: Rules and Regulations

AQ booklet and forms

AP-1 forms (2)

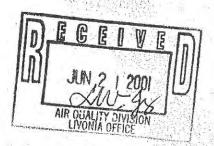
ACTIVITY REPORT PLAINT ORIGINAL STATUS DIVISION OF AIR POLLUTION CONTROL SPECIAL **REVISED STATUS** BUREAU OF INDUSTRIAL HEALTH & AIR POLLUTION CONTROL STATUS MICHIGAN DEPARTMENT OF PUBLIC HEALTH DATE ESTABLISHMENT NAME ESTABLISHMENT NO. TETAL COUNTY NO. 74 CONTACT DISTRICA 3 ORIGIN 1 5.1. 2 REQ. CITIZEN REMARKS 3 REQ, MGMT. 4 REQ. LOCAL H.D. 5 REQ. LOCAL GOV. 6 REQ. STATE/FED. GOV. 7 OTHER ESTABLISHMENT 1 INDUSTRIAL 2 COMMERCIAL 3 GOV. FAC. 4 MASN 6 RESIDENCE 6 OTHER DESCRIPTION 1 NEW ESTAB. 2 FIRST FISCAL 3 REVISIT 4 PHONE 5 DIST. OFFICE 6 LANS. OFFICE 7 COMPLAINT REC'D B STATUS UPDATE 9 NO CONTACT 0 OTHER ACTIVITY 1 PROG. INVEST. 2 SCHED, INVEST. 3 COMP. INVEST. 4 PERMIT EVAL. 5 OBSERVATION 6 FOLLOW UP 7 STUDY B MAPCC MTG. 9 LECTURE 0 OTHER TYPE NO. TESTS 1 SOURCE INVEST. 2 S.T. PART 3 S.T. CO2, O2 4 S.T. OTHER 6 PITOT TRAV. 6 COMM. SURVEY 7 MASN B AUDIENCE 9 VISIBLE EMISS. SOURCE CATEGORY DATE A DATE B DATE C POLL. STATUS O OTHER NAME NO. NO. NO. MO. YR. MO. YR. UPDATE MO. YR. NEXT INVEST. POLLUTANT CODE CORRECTIONS 6 HC 1 PART 2 SMOKE 7 ODOR 3 502 8 OTHER REQUIRED 4 NO2 STATUS DATE A DATE B DATE C g POLL. STATUS 5 CO 0 NO. NO. MO. YR. MO. MO YR. YR. COMPLETED SOURCE CATEGORY NAME NO.



Mascotech SRN: B6247

June 15, 2001

Ms. Joyce Zhu Air Quality Division SE Michigan District Office 38980 West Seven Mile Road Livonia, Michigan 48152-1006



Re: Sport Rack Automotive, 2655 16th Street, Port Huron, Michigan

Dear Ms. Zhu:

Progressive Environmental Consulting and Engineering, Inc. (Progressive) is forwarding this document on behalf of SportRack Automotive. Progressive was retained to assist SportRack Automotive with environmental compliance issues, specifically to provide an evaluation of all permits to install and possibly complete the proper procedures for voiding permit(s) to install.

The facility currently operating under the name Huron St. Clair, Inc, and/or Advance Accessory Systems with a location of 1721 Dove Road, Port Huron, Michigan should be changed to:

SportRack Automotive, Inc. 2655 16th Street Port Huron, Michigan Attn: Mr. Loren Maxon, Maintenance Supervisor (810) 987-2670

You may contact Mr. Maxon directly at (810) 989-1449 to verify the change in company name and facility location.

According to the information reviewed by Progressive Environmental from the Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) records, SportRack Automotive currently has four (4) active permits to install. The air permit numbers are identified as 614-92, 600-82A, 686-92, and 569-92. Progressive Environmental's evaluation of the facility and the current permits to install will be completed by July 31, 2001, unless sampling is required.

Progressive Environmental and SportRack Automotive requests that a copy of all correspondences between MDEQ-AQD and SportRack Automotive be sent to Progressive Environmental. We look forward to working with MDEQ-AQD in the near future.

If you have questions you can call me at (810) 285-1270.

Sincerely, PROGRESSIVE ENVIRONMENTAL CONSULTING AND ENGINEERING, INC. Frederick J. abol

Frederick J. Abdou, P.E., R.E.M.

Environmental Compliance Manager

FJA/WD

Copy: Mr. Loren Maxon, SportRack Automotive



September 12, 1989

Ms. Terri Harmon Michigan State Police Fire Marshall Division 7150 Harris Drive Lansing, MI 48913

RE: UNDERGROUND STORAGE TANKS

Dear Ms. Harmon:

Vessels identified as underground storage tanks and registered under State Identification Number 012081 to St. Clair Metal Products Co., 1721 Dove Street, Port Huron, MI, have been excavated and removed from premises per the following schedule.

| TANK NO. | <u>C</u> | APACITY | | REMOVED FROM GROUND | BY |
|----------|----------|---------|------|---------------------|----------|
| 1. | 20 | 16000 | Gal. | 11-22-88 | S.C.M.P. |
| 2. | 1200 | (6000) | Gal. | 11-23-88 | M.P.C. |
| 3. | 1200 | (6000) | Gal. | 11-23-88 | M.P.C. |
| 4. | | 1000 | Gal. | 11-24-88 | M.P.C. |

Tank No. 1 sold for re-use. Tanks Nos. 2, 3, and 4 were destroyed and scrapped.

Please remove Tank No. 5 from your files: It was originally registered incorrectly. It did not store a regulated substance and hence did not require registration. However, this tank was removed as part of our tank removal project.

Enclosed with this letter is a copy of the registration form on which designated tanks were registered.

Note: In April of 1989, S.C.M.P. Co. was absorbed into Huron/St. Clair, Inc., a Division of Masco Industries Corp. Huron/St. Clair is located at 2655 16th Street, Port Huron, MI 48060, phone number (313) 987-2670.

Yours truly,

Dean Cunningham

Facilities Engineer

DC: dmw

2655 16TH ST., P.O. BOX 611045, PORT HURON, MICHIGAN 48061-1045 (313) 987-2670 FAX (313) 987-5508

MICHIGAN STATE POLICE FIRE MARSHAL DIVISION UST PROGRAM SUSPECTED CONFIRMED RELEASE Sec. 280,50/280.61 EPA Rules

| Person Reportir | ng Release John Wayner |
|-------------------|--|
| Location of Re | ease |
| Facility Name | thron St. Clair dnc., Co. St. Clair Metal Products |
| Address | 1721 Dove St. 0012081 |
| City/State/Zip | Port Huron, 48060 |
| County | St. Clair Township City |
| Are Tanks Regis | tered with State: (Yes)/ No |
| | Address |
| Address | Same |
| City/State/Zip | |
| Contact Person | Phone # (13) 291-5653 |
| Have you notifi | Dean cunningham 313 984 5/23 |
| DNR: Yes_ N | oX Local Fire Department: YesX No |
| Release Informa | tion |
| Type of tank | Steel capacity 6,000 |
| Substance Release | sed toluene removed Nov. 1988 |
| Site Condition | (Circle reason for believing a leak may have/has occurred) |
| Presence of pro | duct/vapors in soil/basements/failed tank tightness test |
| Unusual operation | ng conditions (sudden loss of product/inventory records) |
| other <u>site</u> | assessment showed contamination |
| | e contacted via TX (date/time) |
| Copy of this for | rm sent to: DNR (field) X FD (information only) X |
| Financial Respon | |
| Person Receiving | Information Dur HOUMOD Date/Time Received 6/27/89 |
| (5/89) | ******INTERNAL USE ONLY***** |

Notification for Underground Storage Tanks

FORM

Ground Water Quality Division Department of Natural Resources Box 30157 Lansing, MI 48909

Date Received

SEP 13 198 ROD COMPLIANCE GENERAL INFORMATION

is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA),

The primary purpose of this notification program is to locate and evaluate under-ground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means—

(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and

(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides or fumigants,

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are: 1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel

for noncommercial purposes; 2. tanks used for storing heating oil for consumptive use on the premises where stored:

6. storm water or waste water collection systems:

7. flow-through process tanks: 8. liquid traps or associated gathering lines directly related to oil or gas production and

9, storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per superstitute and 14.7 pounds per

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed \$10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. This form must by completed for each location containing underground storage tanks. If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached

| | - 15 | Α. |
|---|------|----------|
| | 21 | 1 |
| | 1 | 5 |
| _ | | - market |

II, LOCATION OF TANK(S) : I. OWNERSHIP OF TANK(S) Owner Name (Corporation, Individual, Public Agency, or Other Entity) (If same as Section 1, mark box here Street Address ST. CLAIR METAL Street Address or State Road, as applicable County 1721 DOVE STREET ZIP Code County 2110 07. CL ZIP Code City (nearest) Area Code 48060 Type of Owner (Mark all that apply [3]) rivate or Indicate Mark box here if tank(s) State or Local Gov't Corporate number of are located on land within Federal Gov't Ownership an Indian reservation or tanks at this (GSA facility I.D. no. on other Indian trust lands location

III, CONTACT PERSON AT TANK LOC

Name (If same as Section I, mark box here UNNINGHAM

Job Title

Phone Number

IV. TYPE OF NOTIFICATION

Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative

Date Signed

HARON BAKER

CONTINUE ON REVERSE SIDE

Owner Name (from Section I) TECHNOLOGY. INC. Location (from Section II) PRODUCTS, INC. Page No. 2

| VI. DESCRIPTION OF UNDERGROUP | | NKS (Complete for | each tank at this k | rcallon.) 🤼 🤄 | 114 |
|---|----------------|-------------------|---------------------|---------------|-----------------------------|
| Tank identification.Nd. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3) | Tank No. | Tank No. | Tank No. | Tank No. | Tank No. |
| 1. Status of Tank (Mark all that apply 函) Temporarily Out of Use Permanently Out of Use Brought into Use after 5/8/86 |).(B) | × × | | | |
| Estimated Age (Years) S. Estimated Total Capacity (Gallons) | 10000 | 11.42 | 11-4R | 2.4R | LUR. |
| 4. Malerial of Construction Steel (Mark one 図) Concrete Fiberglass Reinforced Plastic Unknown Other, Please Specify | | | | | CROSS-LINK Polijoli Fins |
| 5. Internal Protection (Mark all that apply 函) Interior Lining (e.g., epoxy resins) None Unknown Other, Please Specify | | | | | |
| 6. External Protection (Mark all that apply 2) Fiberglass Reinforced Plastic Coated None Unknown Other, Please Specify | | | | | |
| 7. Piping (Mark all that apply 図) Galvanized Steel Fiberglass Reinforced Plastic Cathodically Protected Unknown Other, Please Specify | | | 8000 | | |
| 8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply 21) Cascoline (including alcohol blends) Other, Please Specify C. Hazardous Substance Please Indicate Name of Principal CERCLA Substance OR Chemical Abstract Service (CAS) No. Mark box 21 If tank stores a mixture of substances d. Unknown | Sogat: | Toolene | Toulene | ALKALI OIL | WATER |
| 9. Additional Information (for tanks permanently taken out of service) a. Estimated date last used (mo/yr) b. Estimated quantity of substance remaining (gal.) c. Mark box 🗵 if tank was filled with inert material (e.g., sand, concrete) | 9/84 20006A | 5/78 30gal | 5778 3091L | | |

Notification for Underground Storage Tanks

NO. 2050-0049 NOVAL EXPIRES 6-30-84 🗼 🛵

Ground Water Quality Division Department of Natural Resources Box 30157 Lansing, MI 48909

MAY 0 8 1986

I.D. Number

STATE USE ONLY

Date Received

GOD-COMPLIANCE

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA),

The primary purpose of this notification program is to loc the and evaluate underground tanks that store or have stored petroleum of haza-does substances. It is expected that the information you provide will be be set on susconably available records, or, in the absence of such ecords you knowledge, belief, or recollect of.

Who Must Notify? Section 9012 of the sale as amended, requires the replaced owners of underground tank that store regulated substances must notify designated. State or local agencies of the existence of their and so Cowler means—

(a) in the case of an underground storage tank in the bulk of the control of the storage, use, or dispensing of regulated substances, and

(b) in the case of any underground storage tank in use before November 8, 1985, but no longer in use on that date, any person who owned such tank immediately before

but no longer in use on that date, any person who owned such tank immediately b the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined at ally on, or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: I, gasoline. used oil, or diesel fuel, and 2, industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:

1. farm or residential tanks of 1.100 gallons or less capacity used for storing motor fuel for noncommercial purposes;

2. tanks used for storing heating oil for consumptive use on the premises where stored; 3. septic tanks;

pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
 surface impoundments, pits, ponds, or lagoons;

6. storm water or waste water collection systems;

7. flow-through process tanks;

8. liquid traps or associated gathering lines directly related to oil or gas production and

gathering operations:

9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance lefined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of bose substances regulated as hazardous waste under Sublitle C of RCRA. It also in ludes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986, 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed \$10,000 for each tank for which notification is not given or for which false information is submitted.

Please type or print in ink all items except "signature" in Section V. This form must by completed for each location containing underground storage tanks. If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached

| | 11 | * |
|---|----|---|
| | 3/ | i |
| | 1 | 4 |
| _ | _ | |

| I. OWNERSHIP OF TANK(S) | II. LOCATION OF TANK(S) |
|---|---|
| Owner Name (Corporation, Individual, Public Agency, or Other Entity) MECHANIC AL TECHNOLOGY, INC. | (If same as Section 1, mark box here) Facility Name or Company Site Identifier, as applicable |
| Street Address 968 ALBANY-SHAKER ROAD County ALBANY | ST. CLAIR METAL PRODUCTS COMPAN Street Address or State Road, as applicable |
| City LATHAM State ZIP Code 12/10 | ST. CLAIR |
| Area Code Phone Number 785 - 2211 | City (nearest) State ZIP Coda PORT HURON MI 48060 |
| Type of Owner (Mark all that apply) Current State or Local Gov't Corporate Former Federal Gov't Ownership uncertain | Indicate number of tanks at this location Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands |
| III. CONTACT PERS | ON AT TANK LOCATION |

Name (If same as Section I, mark box here

IV. TYPE OF NOTIFICATION

Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative

UNNINGHAM

Date Signed 3-26-86

MARON

CONTINUE ON REVERSE SIDE

| MECHANICAL Owner Name (from Section I) TECHNOLOGY, INC. | Location (from Se | 57. Co | LAIR META | | 12081 12081 |
|--|-------------------|--------------|---------------|----------|----------------------------|
| VI, DESCRIPTION OF UNDERGROU | | | | | 7.0 |
| Tank Identification Nd. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3,1) | Tank No. | Tank No. | Tank No. | Tank No. | Tank No. |
| 1. Status of Tank (Mark all that apply 图) Temporarily Out of Use Permanently Out of Use Brought into Use after 5/8/86 | | | | | BE BE |
| 2. Estimated Age (Years) | 8-48 | | 11-42 | 2.48 | LYR. |
| 3. Estimated Total Capacity (Gallons) | 16600 | 1200 | 1200 | 1000 | 1100 |
| 4. Material of Construction Steel (Mark one 图) Concrete Fiberglass Reinforced Plastic Unknown Other, Please Specify | | | | | CROSS-LINK Polyola Fins |
| 5. Internal Protection (Mark all that apply (20)) Interior Lining (e.g., epoxy resins) None Unknown Other, Please Specify | | | | | |
| 6, External Protection (Mark all that apply 函) | | | | | 2/C JACKET |
| 7. Piping Bare Steet (Mark all that apply 函) Galvanized Steet 'Fiberglass Reinforced Plastic Cathodically Protected Unknown Other, Please Specify | | 80000 | NO CONTRACTOR | | |
| 8. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply M) Gasoline (including alcohol blends) Used Oil Other, Please Specify c. Hazardous Substance Please Indicate Name of Principal CERCLA Substance Chemical Abstract Service (CAS) No. Mark box M if tank stores a mixture of substances d. Unknown | So GAC | Towlers | Towlene | | WATER |
| 9. Additional Information (for tanks permanently taken out of service) a. Estimated date last used (mo/yr) b. Estimated quantity of substance remaining (gal.) c. Mark box 13 if tank was filled with inert material (e.g., sand, concrete) | 9/84 | 5/78 309N | 5/78 3091L | | |

Masco Industries, Inc.

21001 VAN BORN ROAD

Taylor, Michigan 48180

June 27, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED (P 085 552 889)

Ms. Terri Harmon Michigan State Police Fire Marshall Division 7150 Harris Drive Lansing, Michigan 48913

Dear Ms. Harmon:

I am writing you on behalf of Huron - St. Clair Inc., 1721 Dove Street, Port Huron, Michigan 48060, a subsidiary of Masco Industries. Today Huron - St. Clair Inc. gave you verbal notification via telephone of a small release of toluene to the soils from an underground storage tank (UST). This letter is to confirm that notice and provide written details of the notice.

St. Clair Metal Products, the predecessor of Huron - St. Clair Inc. installed a 6,000 gallon underground storage tank in 1974 and subsequently discontinued its use in 1978 after removing its contents of toluene. During November of 1988 this registered UST was removed from the ground. The removal was witnessed by the Port Huron Fire Marshall.

Following removal, the tank was on a storage pad until April 1989 awaiting disposal arrangements. During April it was cut open for disposal of the scrap steel. At that time small pin hole size perforations were noted. This discovery prompted Huron - St. Clair Inc. to investigate whether a release of toluene may have occurred prior to the tank removal. Soil samples were collected and analyzed; the results were received today, indicating low levels of toluene. The results varied between a low of "below detection" to a maximum of 84 ppm with the average of 11 ppm.

Huron - St. Clair Inc. today has begun a further investigation of the extent of this release. A hydro-geological consulting firm has been contracted to investigate the toluene release and its environmental impact. Following the results of that investigation a remediation plan will be developed and a remediation firm will be contacted to conduct the remediation.

Masco Industries, Inc.

Ms. Terri Harmon June 27, 1989 Page 2

Huron - St. Clair Inc. is proceeding today, in this direction, as an environmentally responsible corporation. They will keep your office or other controlling agencies informed as each step in this process occurs.

Should you have any questions concerning this situation, please feel free to contact myself at 313-291-6653.

Sincerely

Lohn D. Wagner, P.E. Environmental Engineer

/ldf

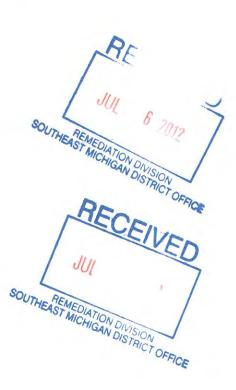
Baseline Environmental Assessment for Former Advanced Accessory Systems 1721 Dove Street

Port Huron, Michigan

Prepared for: 316 Hoffman, LLC

May 2012 Project No. G120224A





BASELINE ENVIRONMENTAL ASSESSMENT

CONDUCTED PURSUANT TO
ENVIRONMENTAL REMEDIATION

PART 201 OF THE NREPA,1994 PA 451, AS AMENDED

AND THE PART 201 RULES PROMULGATED THEREUNDER

FOR

FORMER ADVANCED ACCESSORY SYSTEMS

1721 DOVE STREET

PORT HURON, MICHIGAN

PREPARED FOR: 316 HOFFMAN, LLC

MAY 2012 PROJECT NO. G120224A

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LIST OF ATTACHMENTS

Attachment 2 FTC&H, Phase I Environmental Site Assessment for Former Advanced Accessory System, 1721 Dove Street, Port Huron, Michigan, April 2012.

Attachment 3 FTC&H, Phase II Environmental Site Assessment for Former Advanced Accessory System, 2655 1721 Dove Street, Port Huron, Michigan, May 2010.

LIST OF ABBREVIATIONS/ACRONYMS

Legal Property Description

AST aboveground storage tank **ASTM** American Society of Testing and Materials Baseline Environmental Assessment BEA bgs below ground surface Code of Federal Regulations CFR DWC **Drinking Water Criteria DWPC Drinking Water Protection Criteria ESA Environmental Site Assessment** FTC&H Fishbeck, Thompson, Carr & Huber, Inc.

GRCC Generic Residential Cleanup Criteria
GSI Groundwater/Surface Water Interface Criteria

TABLE OF CONTENTS



GSIPC Groundwater/Surface Water Interface Protection Criteria

MDEQ Michigan Department of Environmental Quality

NREPA Natural Resources and Environmental Protection Act

PA Public Act

PCBs polychlorinated biphenyls PCE tetrachloroethylene PID photoionization detector

PNA polynuclear aromatic hydrocarbons

PVC polyvinyl chloride

REC recognized environmental condition

SB soil boring

SBDL Statewide Default Background Levels

SVOC semivolatile organic compound

TCE trichloroethene TW temporary well

UST underground storage tanks

VC vinyl chloride

VOC volatile organic compound

1.0 INTRODUCTION

This BEA was conducted for 316 Hoffman, LLC of Royal Oak, Michigan (Hoffman), for the property located at 1721 Dove Street, St. Clair County, Michigan (the subject property). A location map for this property is provided as Figure 1, a site diagram is provided as Figure 2, and site photographs are provided as Figure 3.

The subject property is located in the SE ¼ of the SE ¼ of Section 16, Town 6N, Range 17E, Port Huron, St. Clair County, Michigan. The subject property's tax identification number is 06-182-0045-000. The legal property description for the property is included in Attachment 1.

The subject property is approximately 5.51 acres in size and contains a 105,773-square-foot, single-story, slab-on-grade, steel-frame industrial building constructed in 1966. The subject property adjoins, and is accessed from, Dove Street, which is present along the south side of the subject property. Additional site improvements include paved parking drives and service areas, landscaping, and loading docks.

This BEA was conducted according to the December 14, 2010, Part 201 amendments to the BEA process, as defined by the Environmental Remediation, Part 201 of the NREPA, 1994 PA 451, as amended, and the Part 201 Rules promulgated there under, for the purpose of establishing an exemption to liability pursuant to Section 20126(1)(c) for a new owner or operator of property that is a *facility*, as defined by Section 20101(1)(r). The BEA was completed in accordance with the instructions associated with the BEA submittal Form EQP 4025 (dated April 2011), which provides guidance for the preparation and submittals of BEAs to the MDEQ.

The subject property was determined to be a *facility*, as defined in Section 20101(1)(o) of Part 201 of the NREPA, 1994 PA 451, as amended, due to the presence of VC, chromium, and lead detected in groundwater at concentrations exceeding Part 201 GRCC DWPC. These criteria are found in R299.5744 and R299.5746 of the Part 201 Rules of the NREPA, as amended.

2.0 INTENDED USE OF THE PROPERTY

Hoffman intends to sell the vacant subject property within 30 days of taking ownership. No hazardous substances will be used on the subject property.

3.0 PHASE I ESA

3.1 EXECUTIVE SUMMARY

FTC&H conducted a Phase I ESA on the subject property titled, *Phase I Environmental Site Assessment for Former Advanced Accessory System, 1721 Dove Street, Port Huron, St. Clair County, Michigan, dated April 2012* (Attachment 2). The April 2012 Phase I ESA was an update to the January 2011 and May 2010 Phase I ESA updates conducted on the subject property by FTC&H, and to the September 7, 2009, Phase I ESA conducted on the subject property by Nova.

The Phase I ESA was conducted in conformance with the scope and limitations of ASTM Standard Practice E 1527-05 (ASTM Standard), and constitutes *all appropriate inquiry* into the previous ownership and uses of the property consistent with good commercial or customary practice, as defined in *Standards* and *Practices for All Appropriate Inquiries (AAI)* (40 CFR Part 312).

The subject property is approximately 5.51 acres in size and contains a 105,773-square-foot, one-story, slab-on-grade, steel-frame industrial building constructed in 1966. The subject property is located within an area of light industrial and warehouse facilities. The following properties border the subject property:

North: Former Advanced Accessory Systems, 2655 16th Street location.

South: Dove Street, then Earl C. Smith Distributing and the Pro-Weld facility.

East: Former The Crown Group Port Huron (vacant).

West: DHL Global Forwarding and the Norman Jensen Warehouse facility.

The subject property is currently vacant, but was previously occupied by various automobile parts manufacturers including, most recently, fabricators of metal roof rack systems. The manufacturing processes included the use and storage of several petroleum and chemical-based products and wastes.

There are abandoned and discarded containers onsite from the previous operations. These containers are identified on the attached Form EQ4476, per Part 9 of the BEA Rules. Hoffman will comply with all applicable local, state, and federal laws for the disposal of these materials.

The Phase I ESA identified the following RECs in connection with the subject property:

A. The subject property is a *facility*, as defined in Part 201 of the NREPA, P.A. 451 of 1994, as amended, due to the presence of vinyl chloride, chromium, and lead in the groundwater at concentrations exceeding Part 201 GRCC.



B. The material threat of a release of petroleum products to soils beneath oil-stained, cracked concrete floors in several chemical storage areas.

3.2 LIMITATIONS, EXCEPTIONS, AND DELETIONS

The information gathered for the Phase I ESA was limited to information that was publicly available, obtainable within reasonable time and cost constraints, and was practically reviewable. It was also limited to accessible areas and conspicuous visual indicators encountered during the site reconnaissance. The ESA interpretations were made within the context of these limitations. There were no exceptions or deletions to the standard.

3.3 DATA GAPS

During the course of the Phase I ESA, FTC&H identified the following data gap:

• FTC&H was unable to interview any prior occupants of the subject property during the course of this investigation. It is unlikely the occupants would have any additional knowledge of the subject property that was not determined through the historical research, regulatory file review, and site reconnaissance conducted as a part of this Phase I ESA. Therefore, this data failure is not considered a significant data gap.

This data gap is unlikely to have an effect on this BEA. The Phase II ESA investigation discussed below was conducted, in part, to determine if historical uses have created conditions that would define the subject property as a *facility*, as defined by Section 20101(1)(r).

4.0 PHASE II ESA

4.1 PURPOSE

In April 2010, FTC&H conducted a Phase II ESA on the subject property to further investigate the RECs identified in the May 2010 Phase I ESA to determine if the subject property is a *facility*, as defined in Part 201 of the NREPA, P.A. 451 of 1994, as amended. The subject property has been vacant and has not changed significantly since 2010; therefore, the data collected for the May 2010 Phase II ESA is considered sufficient for the subject property. A copy of the May 2010 Phase II ESA for the subject property is included as Attachment 3.

4.2 METHODS

FTC&H oversaw the completion of five soil borings and the installation of five temporary monitoring wells on April 14, 2010. The drilling was completed using the direct-push method. Alluvial Earth Inc., Standish, Michigan, was subcontracted to complete the work, and a FTC&H geologist was present to characterize the soil and collect soil and groundwater samples. The soil boring locations are shown on Figure 2.

The soil boring locations and rationale for each sample are described below.

- SB/TW-1 was completed to evaluate the soil and groundwater quality near the trench drain sump and oil-stained concrete, located in the eastern portion of the building, and in the vicinity of Nova's GP-6 location.
- SB/TW-2 was completed to evaluate the soil and groundwater quality near the hydraulic oil ASTs and associated stained concrete, located within the building, and adjacent to Nova's GP-2 location.
- SB/TW-3 was completed to evaluate the soil and groundwater quality near the waste oil pump tank and stained concrete, located near the northwest corner of the building, and adjacent to Nova's GP-1 location.
- SB/TW-4 was completed to evaluate the soil and groundwater quality near the oil house containing the two ASTs, located at the northwest corner of the building, and adjacent to Nova's GP-7 location.
- SB/TW-5 was completed to evaluate the soil and groundwater quality in the location of the former UST, along the south side of the building, and adjacent to Nova's GP-9 location.

The soil borings were installed using the Geoprobe and macro-cores equipped with single-use acetate liners. A continuous core of soils was collected at each boring location, and the soils were described by a



FTC&H geologist. The soils were field screened for the presence of total organic vapors using a PID. Soil samples were collected from each boring from the interval corresponding to the highest PID reading in the soils or where visual evidence indicated the greatest potential for contamination.

Temporary wells were installed at each soil boring location to collect groundwater samples. The temporary wells were constructed of 1-inch-diameter PVC risers, equipped with a 5-foot-long PVC screen, and were installed into the upper portion of the uppermost water-bearing unit. The wells were sampled using a peristaltic pump, equipped with disposable tubing, following low-flow methods.

On April 15, 2010, groundwater samples were collected from five of the existing monitoring wells located at the subject property. Samples collected from these wells were labeled corresponding to the labeling system that Nova utilized during their Phase II ESA sampling. The well designations from previous site work are included in parentheses: MW-A (OW-7), MW-C (MW-14), MW-D (MW-8), MW-E (MW-11), and MW-F (MW-9). The wells were sampled using a peristaltic pump, equipped with disposable tubing, following low-flow methods. Standard low-flow sampling techniques could not be used at MW-D (MW-8), where there was a very small amount of water present in the well. MW-D (MW-8) purged dry immediately and was allowed to recover before collecting the groundwater sample. Due to slow recovery, a small amount of water in the well, and limited amount of sample volume, only a subset of the analytical parameters could be tested from the MW-D (MW-8) groundwater sample.

The soil and groundwater samples were collected directly into laboratory-prepared bottles, stored on ice in an insulated cooler, sealed, and transported under chain-of-custody documentation to TriMatrix Laboratories, Inc. (TriMatrix), Grand Rapids, Michigan, for analysis. The samples were analyzed for VOCs (8260 Plus scan), PNAs, and the Michigan 10 Metals (arsenic, barium, cadmium, chromium, copper, lead, mercury, selenium, silver, and zinc). MW-D (MW-8) was only analyzed for VOCs.

4.3 ANALYTICAL RESULTS

The groundwater analytical results indicate the following:

- VC was detected at concentrations exceeding Part 201 GRCC DWC at four sample locations (TW-2, TW-5, MW-C, and MW-E);
- Total chromium was detected at concentrations exceeding Part 201 GRCC GSI at three locations (TW-3,MW-A, and MW-C), and exceeding Part 201 GRCC DWC at one location (MW-C); and
- Total lead was detected at a concentration exceeding Part 201 GRCC DWC at one sample location (TW-3).

Total chromium was detected in all five of the soil sample locations sampled during the Phase II ESA (SB-1 through SB-5) at concentrations exceeding one of the Part 201 GRCC, but below SDBLs for chromium. None of the other tested soil samples (VOCs, PNAs, or Michigan 10 Metals) exceeded their respective Part 201 GRCC. Additionally, none of the soil samples exceeded their respective Part 201 GRCC. The groundwater data is summarized in Table 1.

4.4 FACILITY STATUS

Based on the concentrations of VC, chromium, and lead detected in groundwater samples at a concentration exceeding Part 201 GRCC; the property is a *facility*, as defined in Part 201 of the NREPA, PA 451, 1994, as amended.

5.0 CONCLUSIONS

FTC&H concludes this assessment is sufficient for protection to the prospective owner and operator in accordance with Section 20126(1)(c) of Part 201 of the NREPA, as amended.

6.0 IDENTIFICATION OF AUTHOR AND DATES BEA WAS CONDUCTED AND COMPLETED

The persons with primary responsibility for the data assembly, interpretation, and technical conclusions of this BEA are Todd C. Campbell, CPG and Thomas M. Budge, CHMM of FTC&H.

| DATE BEA CONDUCTED: | MAY 7, 2012 | |
|--------------------------|-------------|-------------------------|
| Assessment Conducted By: | | Assessment Reviewed By: |
| Todd C. Campbell, CPG | | Thomas M. Budge, CHMM |

7.0 REFERENCES

Baseline Environmental Submittal Form, Form EQP 4025 (April 2011), submittal of a BEA, as defined by the Environmental Remediation, Part 201 of the NREPA, 1994 PA 451, as amended, and the Part 201 Rules promulgated there under, for the purpose of establishing an exemption to liability pursuant to Section 20126(1)(c) for a new owner or operator of property that is a *facility*, as defined by Section 20101(1)(r).

Natural Resources and Environmental Protection Act, 1994 PA 451, Part 201, as amended.

8.0 ATTACHMENTS

Attachment 1 Legal Property Description

Attachment 2 FTC&H, Phase I Environmental Site Assessment for Former Advanced Accessory System, 1721 Dove Street, Port Huron, Michigan, April 2012.

Attachment 3 FTC&H, Phase II Environmental Site Assessment for Former Advanced Accessory System, 2655 1721 Dove Street, Port Huron, Michigan, May 2010.

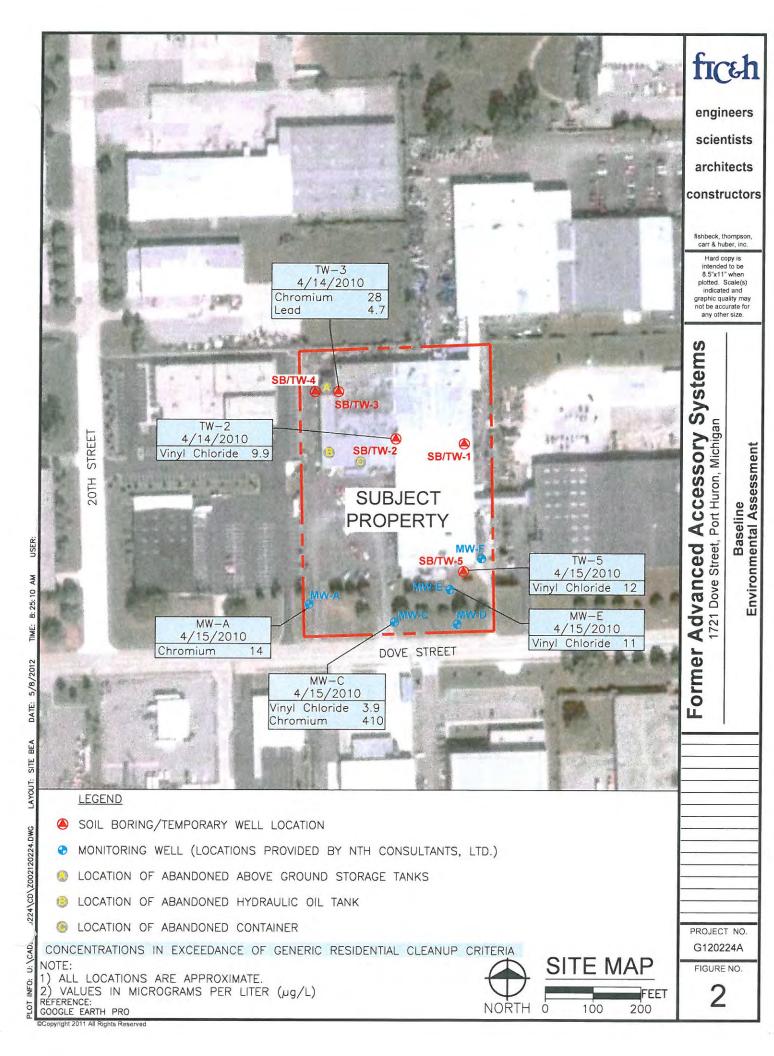


Table 1 - Groundwater Data

Baseline Environmental Assessment

1721 Dove Street, Port Huron, Michigan

| Sample Location Sample Date | | | TW-2 | TW-3 | TW-5 | MW-A 4/15/2010 | MW-C | MW-E | Residential Drinking Water Criteria | Groundwater Surface Water Interface Criteria | Groundwater Contact Criteria | Residential Volatilization To Indoor Air Inhalation Criteria | Acute Inhalation Screening Level |
|-----------------------------|------|-----------|------|---------|------|-------------------|------|------|---|--|---------------------------------|---|-------------------------------------|
| Hazardous Substance | Unit | CAS No. | | | | | | | | | | | |
| Vinyl Chloride | µg/L | 75-01-4 | 9.9 | 1991 | 12 | 44 | 3.9 | 11 | х | 19. | - 1.45.F | 727 | |
| Chromium, Total | µg/L | 7440-47-3 | | 28 | 1 2 | 14 | 410 | (++) | - | × | (4.7) | 744 | |
| Chromium, Total | µg/L | 7440-47-3 | 45 | T Get 1 | 0-8; | | 410 | 150 | X | | | 4 - | |
| Lead, Total | µg/L | 7439-92-1 | 194 | 4.7 | | | | 14.5 | X | | 7 | | |

Evaluation Criteria – Part 201 Generic Cleanup Criteria, Michigan Department of Environmental Quality, Remediation Division Operational Memo 1, Attachment 1, revised March 25, 2011. µg/L = micrograms per liter.

CAS = Chemical Abstract Service.

X = denotes GRCC exceedances.

-- = denotes no exceedances of GRCC.

Phase I Environmental Site Assessment for Former Advanced Accessory System 1721 Dove Street Port Huron, Michigan

Prepared for: 316 Hoffman, LLC Royal Oak, Michigan

> April 2012 Project No. G120222



PHASE I ENVIRONMENTAL SITE ASSESSMENT FOR FORMER ADVANCED ACCESSORY SYSTEM 1721 DOVE STREET PORT HURON, MICHIGAN 48060

PREPARED FOR: 316 HOFFMAN, LLC ROYAL OAK, MICHIGAN

APRIL 2012 PROJECT NO. G120224

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LIST OF ABBREVIATIONS/ACRONYMS

Site Photographs

Standards Checklist

USGS Topographic Map

Interview Documentation

Historical Research Documentation

Qualification Statements for Environmental Professionals

| AAI | all appropriate inquiry |
|------|---|
| | |
| ACM | asbestos containing material |
| AIRS | Permit and Emissions Inventory Data |
| amsl | above mean sea level |
| AST | aboveground storage tank |
| ASTM | American Society for Testing and Materials |
| AULs | activity and use limitations |
| BEA | Baseline Environmental Assessment |
| bgl | below ground level |
| bgs | below ground surface |
| BOD | biochemical oxygen demand |
| BTEX | benzene, toluene, ethylbenzene, and xylenes |
| | |

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BTX benzene, toluene, xylenes

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CERCLIS Comprehensive Environmental Response, Compensation, and Liability Information

System

CESQG conditionally-exempt small-quantity generator

CFR Code of Federal Regulations

CORRACTS facilities subject to Corrective Action under RCRA

DCA dichloroethane

DCE dichloroethene or dichloroethylene

DRO diesel range organics EC engineering controls

EDR Environmental Data Resources, Inc.

EPCRA Emergency Planning and Community Right to Know Act

ERNS Emergency Response Notification System

ESA Environmental Site Assessment

FINDS Facility Index System/Facility Registration System

FOIA U.S. Freedom of Information Act

FR Federal Register

FTC&H Fishbeck, Thompson, Carr & Huber, Inc.
GRCC Generic Residential Cleanup Criteria

GRO gasoline range organics

HVAC heating, ventilating, and air conditioning

IC institutional controls

kg kilograms

LEPC local emergency planning commission

LLPs Landowner Liability Protections

LQG large quantity generator

LUST leaking underground storage tank

MDEQ Michigan Department of Environmental Quality

MDEQ-AQD Air Quality Division of the MDEQ MDEQ-RD Remediation Division of the MDEQ

MDEQ-RMD Resource Management Division of the MDEQ

MDEQ-RD Remediation Division of the MDEQ
MDEQ-WRD Water Resources Division of the MDEQ
MDNR Michigan Department of Natural Resources

MSDS material safety data sheet MTBE methyl tert butyl ether MW monitoring well

NCP National Contingency Plan

NFRAP former CERCLIS sites where no further remedial action is planned under CERCLA

NPDES National Pollution Discharge Elimination System

NPL National Priorities List NRC National Response Center

NREPA National Resources and Environmental Protection Act

PAH polyaromatic hydrocarbon PCBs polychlorinated biphenyls

PCE tetrachloroethene (or) tetrachloroethylene

PID photoionization detector

PNA polynuclear aromatic hydrocarbons

ppb parts per billion

PRP potentially responsible party

PVC polyvinyl chloride

RBCA Risk Based Corrective Action
RBSL Risk Based Screening Levels

RCRA Resource Conservation and Recovery Act

REC recognized environmental condition

SARA Superfund Amendments and Reauthorization Act

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SERC State Emergency Response Commission

SHWS State Hazardous Waste Site SQG small quantity generator

SVOC semivolatile organic compound SWF/LF Solid Waste Facility/Landfill

TCA 1,1,1-trichloroethane

TCE trichloroethene (or) trichloroethylene

TMB trimethylbenzene

TPH total petroleum hydrocarbons

TSDF treatment, storage, or disposal facility

μg/L microgram per liter μg/mg microgram per milligram μg/kg microgram per kilogram

USC U.S. Code

USDA U.S. Department of Agriculture

USEC/IC U.S. Engineering Controls/Institutional Controls

USEPA U.S. Environmental Protection Agency

USGS U.S. Geological Survey UST underground storage tank

VC vinyl chloride

VOC volatile organic compound

1.0 SUMMARY

FTC&H has performed a Phase I ESA on the Former Advanced Accessory Systems site located at 1721 Dove Street in Port Huron, Michigan 48060 (subject property). This Phase I ESA was conducted in conformance with the scope and limitations of ASTM Standard Practice E 1527-05 (ASTM Standard), and constitutes all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice, as defined in *Standards and Practices for All Appropriate Inquiries (AAI)* (40 CFR Part 312). This report is an update to the January 2011 and May 2010 Phase I ESA updates conducted on the subject property by FTC&H, and to a September 7, 2009, Phase I ESA conducted on the subject property by Nova Consulting Group, Inc (Nova) for Helios AMC, LLC of San Francisco, California (Helios). A copy of the 2011 FTC&H Phase I ESA report is provided on a CD in Appendix 1. The 2011 report contains copies of the other reports listed above.

The purpose of this assessment is to determine if RECs exist on the subject property and to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability.

The subject property consists of 5.51 acres and contains a 105,773-square-foot, one-story, steel-frame, slab-on-grade industrial building and associated drive, parking, and landscaped areas. During the course of this investigation, FTC&H encountered evidence of the following RECs in connection with the subject property:

- A. The subject property's classification as a *facility*, due to the documented presence of vinyl chloride, chromium, and lead in the groundwater at concentrations exceeding Part 201 GRCC.
- B. The material threat of a release of hazardous substances and petroleum products to soils beneath oil-stained, cracked concrete floors in several chemical storage areas.

2.0 INTRODUCTION

2.1 PURPOSE

This document presents the results of a Phase I ESA update to the January 2011 and May 2010 Phase I ESA updates conducted on the subject property by FTC&H, and to the September 7, 2009, Phase I ESA conducted on the subject property by Nova (all provided in Appendix 1). This assessment was conducted by Mr. Todd C. Campbell, CPG, on behalf of 316 Hoffman, LLC (Hoffman) (the User). For reference, Appendix 2 contains a Glossary of Frequently Used Terms.

This Phase I ESA was conducted in compliance with the scope and limitations of the ASTM Standard and AAI. The purpose of the ASTM Standard and AAI is to identify RECs in connection with the subject property and to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability, i.e., "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice."

2.2 DETAILED SCOPE OF SERVICES

The scope of services for this Phase I ESA was developed from discussions between Mr. Robert Stefani, the attorney representing Hoffman, and FTC&H staff. This assessment included a site reconnaissance, review of governmental records and environmental databases, interviews with persons knowledgeable of site conditions, and review of available historical information on the subject property and surrounding properties.

The client did not request that any additional issues be addressed in this report. FTC&H has conducted the scope of services in accordance with the terms and conditions of our proposal dated March 1, 2012.

2.3 SIGNIFICANT ASSUMPTIONS

FTC&H assumes the information reviewed in this assessment (including government records and environmental databases, prior ESAs, and historical sources) is reliable and accurate. We also assume all interviewees have responded truthfully and to the extent of their knowledge.

2.4 LIMITATIONS AND EXCEPTIONS

The information gathered for this Phase I ESA is limited to information that is publicly available, obtainable within reasonable time and cost constraints, and is practically reviewable. It is also limited to



accessible areas and conspicuous visual indicators encountered during the site reconnaissance. The ESA interpretations are made within the context of these limitations.

2.5 SPECIAL TERMS AND CONDITIONS

No special terms and conditions were required in this assessment.

2.6 USER RELIANCE

This Phase I ESA report is provided for the client's exclusive use. The report may also be used by any lender that is loaning funds in connection with the subject property. Any use of the report by others, without the written consent of FTC&H, will be without liability to FTC&H.



3.0 USER-PROVIDED RECORDS

3.1 TITLE RECORDS

The User of the report provided FTC&H with title search information and title commitment for title insurance, issued by Fidelity National Title Insurance Company of Bloomfield Hills, Michigan, dated April 6, 2012, was provided. A copy of the title search and commitment for title insurance for both the subject property and the 2655 16th Street property is provided in Appendix 3.

As part of the May 2010 Phase I ESA, EDR was retained to conduct a complete chain of ownership report for the subject property. Ameristar Public Records Research of Southlake, Texas, completed the report dated April 13, 2010. This report indicated that the first non-city or state owner of the subject property was Grandex, Inc., in September 1965. Grandex, Inc. retained ownership until April 1970, when the property was retained by Masco Corporation. Masco Corporation sold the property to St. Clair Metal Products Company in July 1976. St. Clair Metal Products Company had changed its name to Masco Tech Industrial Components, Inc. by September 1995, when the property was sold to Masco Tech, Inc., who immediately transferred the property to Masco Tech Automotive Systems Group, Inc. Two days later, Masco Tech Automotive Systems Group, Inc. sold the property to Advanced Accessory Systems, LLC. Sportrack, LLC, a Delaware Limited Liability Company (and a division of Advanced Accessory Systems, LLC) sold the property to Sport (MI) QRS 15-40, Inc. (QRS), a Delaware corporation (current owner), in November 2003. The complete Chain of Ownership Report is located in Appendix 1.

3.2 ENVIRONMENTAL LIENS OR ACTIVITY AND USE LIMITATIONS

As part of the January 2011 Phase I ESA, EDR was retained to provide a review of any outstanding or recent environmental liens on the subject property. No environmental liens or activity/use limitations were found for the subject property in the EDR Environmental Lien Search Report, dated December 15, 2010 (refer to Appendix 1).

Mr. James Hewines of Hoffman was unaware of any federal, state, or local environmental cleanup liens in effect for the subject property. In addition, Mr. Hewines was unaware of any legal restrictions on the property's use or for activities conducted on the property.

Judicial records were not reviewed for environmental liens or activity or use limitations; however, the title search information and EDR report referenced above identified no environmental liens or activity and use limitations.

- The area around the metal recycling containers (storage bins), northwest of the building was stained and soiled with metal scraps/shavings. The asphalt in this area has fissures/cracks.
- The compactors west of the building have leaked hydraulic oil and therefore soiled and stained the asphalt in that area. In that area, the surface changes from asphalt to concrete, with subsequent cracks and uncovered storm drain clean-outs.
- Three ASTs, storing alkaline cleansers, were formerly located in the southeast corner of the building. No sampling data for the soil beneath these ASTs was available.
- A floor drain in the extrusion line area has been removed and the resulting hole was filled with concrete. Sampling of the soil surrounding that floor drains was not done at the time the drain was removed.
- The original office portion of the building on this property was built in 1966. Based on the apparent age, some of the materials used in the office areas are suspected ACM. Some of the suspected ACM are vinyl floor tiles, acoustical ceiling tiles and interior drywalls.
- The concrete floor beneath and around the 55-gallon drums inside the "hydraulic room" was markedly soiled and stained.
- Storm drains in the loading dock areas were covered in debris.
- Exterior storage of 55-gallon drums was not in secondary containment.
- Possible need for a storm water permit or the exterior storage of materials. There are storm drains in the fenced area where materials are stored.

The Malcolm Pirnie 2002 ESA Update identified the following additional RECs:

- Muriatic and nitric acid were stored in unregulated outdoor ASTs placed on a concrete pad without secondary containment. The nitric acid tank was made of stainless steel and contained 1,500 gallons. The muriatic acid tank was made of fiberglass and contained approximately 2.500 gallons. Acid was transferred from the tanks to the plant in aboveground stainless steel pipes that were maintained and inspected regularly due to the high cost of acid. Facility personnel estimated that the ASTs were put in service approximately in 1968. The tanks were removed in the early 1990. The ASTs were located in a fenced are on the east side of the facility. The concrete has some cracks. Soil in these areas has not been sampled. The facility does not have any records or memory of releases from these ASTs or pipelines.
- The facility has two transformers, both of which have been classified as non-PCB by EPA regulations. Oil in the transformer that was removed in 1998 contained 93 ppm of PCBs.
- The area in which the LUST was removed shows signs of distressed vegetation.

This report concluded that "...there is less than 50% probability that soil or groundwater at the facility has been affected by a release of acids that would require corrective action in excess of the material threshold defined by the client. Although vegetation appeared stressed at the location of the former UST, Malcolm Pirnie does not recommend additional soil assessment location because the former owner is responsible



A restrictive covenant, prohibiting the installation of a water well and the use of groundwater on a portion of the subject property, was filed with the St. Clair County Register on December 2, 2003 (Appendix 3). No other use limitations for the subject property were identified.

3.3 USER KNOWLEDGE

Mr. Hewines stated on March 26, 2012, that he had no specialized or actual knowledge of any conditions on the subject property that would be interpreted as a REC. Refer to Appendix 4 for the completed User Questionnaire.

3.4 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES

Mr. Hewines stated on March 26, 2012, that he had no knowledge the price of the subject property was significantly lower than the expected market value.

3.5 PRIOR SITE INVESTIGATIONS

There have been several prior site investigations on the subject property. Helios provided FTC&H with portions of the following:

- 1. October 30, 2002, Malcolm Pirnie, Inc. (Malcolm Pirnie) ESA Update of SportRack Automotive (Malcolm Pirnie 2002 ESA Update). This report was an update to the Phase I ESA prepared by Clayton Group Services (Clayton) on August 18, 2001, and revised on October 2, 2001 (Clayton 2001 Phase I ESA). The Malcolm Pirnie 2002 ESA Update identified the following RECs from the Clayton 2001 Phase I ESA:
 - The subject property was historically utilized as a filling area for unknown material. Some unearthed landfilling material was discovered in portion of the property during past construction activities.
 - The subject property is identified as an "open" LUST site by the MDEQ. The history of the LUST site is discussed in the August 2001 Phase I ESA prepared by Progressive Environmental Consulting & Engineering, Inc. [A copy of such was not provided.]
 - The issue of responsibility of the LUST at the subject property was addressed by the asset purchase agreement between MascoTech Automotive Systems Group, Inc., a MascoTech Accessories, Inc., and Advanced Accessory Systems, LLC. [A copy of such was not provided.] MascoTech agreed to remediate soil and groundwater affected with organic chemicals and metals related to the LUST site at the subject property. MascoTech subsequently changed its name to Metal Dyn. Metal Dyn is responsible for and conducts on-going monitoring activities at the LUST site.
 - The asphalt surface beneath and around the empty 55-gallon drums stored on the northeast corner of the property was soiled and stained. There are fissures/cracks in the asphalt in this area.



for conditions associated with the former UST. The facility should file a Notice of Intent to Gain Coverage under the Multi-Sector General Storm Water Permit."

- September 13, 2003, Professional Service Industries, Inc. (PSI) Phase I ESA for SportRack Automotive (2655 16th Street and 1721 Dove Street (PSI 2003 Phase I ESA). This report identified the following RECs:
 - The subject property was listed on the EDR database report as an open LUST site. According to the EDR database report the tanks were removed in 1988. Due to the open status, a file review was conducted with MDEQ. According to the files, the tanks were removed under the supervision of the Fire Marshal in 1988 and no evidence of soil staining was observed at the time of the tank removal. However, during the tank dismantling in 1989, corrosion and holes on the side of a toluene tank were observed and a release was reported. Soil and groundwater samples were obtained after the reported release. Groundwater samples were reported to be above regulatory limits for toluene, TCE, and VC. No soil samples had detected concentrations of contaminants above the State Residential Generic Cleanup Criteria and Screening Levels (GCCSLs), with the exception of toluene. Toluene was analyzed within the soil at 20 times the residential GCCSL for drinking water. Fourteen monitoring wells installed since 1989. The latest groundwater monitoring well data within the files (June 2000) resulted in levels of TCE, toluene and VC above the GCCSLs. A letter from CRA to the MDEQ stated that since 1997, natural attenuation has decreased concentrations of volatiles in the groundwater. However, groundwater levels continue to be above the Tier I Residential Health Based Drinking Water Risk-Based Screening Levels (RBSLs). Due to the current constituent levels, the Corrective Action selected for the site will be revised to include institutional controls. The revised Corrective Action will include a restriction from using on-site groundwater as a drinking water source. The letter also stated that a closure report will be submitted to the DEQ. Based on the known release and contamination located on the subject property, the toluene release appears to represent evidence of a REC in connection with the subject property.
 - The southeast adjoining property (currently The Crown Group) was listed on the EDR Database Report as a Category S BEA (same hazardous substances). Based on the close proximity of the above facility in relation to the subject property, a file review was requested with the MDEQ. As the date of this report, the MDEQ has not responded to PSI's request. When the files are reviewed, any information inconsistent with the report will be forwarded ion an addendum. Based on the category S BEA and the assumed release at the property, it appears to represent evidence of a REC in connection with the subject property.
- 3. October 7, 2003, PSI Operations & Maintenance Plan for Asbestos-Containing Materials at the subject property and adjoining property, 1721 Dove Street. The purpose of this plan "...is to provide building occupants and maintenance personnel with general information covering potential exposure to airborne asbestos fibers and to implement procedures and practices to keep know or assumed ACM in good condition in order to minimize asbestos fiber release and exposure to building occupants." This report listed the following assumed ACM as identified in a PSI 2003 Phase I ESA: Friable ceiling tile and drywall/joint compound and non-friable floor tile/mastic, covebase/mastic, and roofing materials.

- 4. August 12, 2004, EMG Corporation Phase I ESA of Advanced Accessory Systems (EMG 2004 Phase I ESA). This report concluded that "EMG identified no RECs or historic RECs in connection with the subject property except for: 1) the LUST incident at the subject property which has not been designated "case-closed" by the MDEQ, and 2) potential impacts to the subject property from a historic release at the property adjacent to the west."
- 5. September 13, 2004, Constoga-Rovers & Associates (CRA) LUST Closure Report for SportRack Automotive (formerly MascoTech Accessories). This report details the closure activities for the two 1,200-gallon toluene USTs located near the southeast corner of the plant (Facility No. 00012081). The USTs were emptied and removed; however, no soil or groundwater onsite was actively remediated. The site was closed as a Tier I Residential Closure, with deed restrictions limiting the onsite groundwater to non drinking water uses only.
- September 7, 2009, Nova Phase I ESA for Advanced Accessory Systems (Nova 2009 Phase I ESA).
 This report identified the following RECs:
 - Database St. Clair Metal Products at 1721 Dove Street is listed on the SHWS database. The SHWS database identified the Site as an inactive hazardous waste site where no actions taken to address contamination. No additional information regarding contaminants of concern or regulatory status in regards to the Part 201 Program were provided. The listing has the potential to have affected subsurface conditions at the Site as well as regulatory compliance issues; therefore, this listing represents a REC. Nova has made a FOIA request with the MDEQ to review the Part 201 files regarding the subsurface contaminant concentrations as well as compliance with the Part 201 Program. This information was not received in the time frame of this report and is considered not reasonably ascertainable. Additionally, Nova was provided information by Mr. Greg Barrows of the RRD that the Part 201 files could not be located with the MDEQ system.
 - Database St. Clair Metal Products at 1721 Dove Street is listed on the LUST database. The LUST database identifies the Site as having the release number C-0288-89 that was closed in 2004. Although the database indicates that the case has been closed, it does not indicate that contaminants do not still exist in the subsurface. Additionally, the MDEQ Storage Tank Information Database indicates that a Tier I Evaluation was conducted with a Deed Restriction to obtain closure under the Part 213 Program indicating that contaminant levels have exceeded MDEQ Generic Cleanup Criteria. The closure may prohibit certain future unrestricted use of the property; therefore, although this listing does not represent a regulatory compliance issue, the closure type represents a REC.
 - Database A former tenant, Sportrack Port Huron at 1721 Dove Street, is listed on the BEA database. The BEA database identified the Site as having submitted the BEA for this facility in 2004 on behalf of W.P. Carey & Company LLC. The BEA was prepared because the land was determined to contain hazardous substances at levels that would deem the Site a "facility" as defined by Part 201 of NREPA. A "facility" is any property where hazardous substances were found at levels that exceed relevant Generic residential Cleanup Criteria. The BEA was submitted as a Category D BEA, which means that difference hazardous substances intended to be utilized at the "facility" than the type of hazardous substances found to contaminate the subsurface. Nova has made a FOIA request with the MDEQ to review the RRD Part 201 files regarding the site to determine what contaminant levels exist on the property in regards to the BEA submittal. However, as stated above, the Part 201 files could not be located by RRD staff in the MDEQ system.

Additionally, the following items of environmental concern were noted and warrant mention.

- Wells Approximately 11 groundwater monitoring wells were observed on the southern portion of the Site, south of the building in an unsecured area outside of the fence line. These monitoring wells are associated with the former investigation of the leaking USTs...It should be determined by the MDEQ whether all or a portion of the monitoring wells are needed to comply with any future requirements associated with the investigation remedy. If not, then these monitoring wells should be abandoned by a licensed well driller to prevent any potential introduction of hazardous materials to the subsurface by vandalism or accidental release. In the interim, these wells should be monitored to ensure that the well caps are locked.
- Waste Evidence of spills, leaks, overflows, or potential routes of entry to the subsurface were observed in association with the area of concrete floor containing a mixture of water, soluble oil and non-soluble oil next to the area of drum accumulation in the northwest portion of the shop area.
- Waste There were several off-specification and/or waste drums, totes, storage tanks, and smaller containers...located within the shop area that remain in the facility after cessation of operations that should be disposed as RCRA Hazardous or Michigan Industrial wastes. The waste materials for approval and ultimate disposal. Additionally, these drums should be properly labeled and disposed in accordance with RCRA regulations in regards to length of accumulation.
- Waste Evidence of spills, leaks, overflows, or potential routes of entry to the subsurface were observed in association with the observed aboveground tanks located in the oil house northwest of the facility. The concrete containment surrounding the oil and wastewater tanks was observed to contain oil and water as well as the concrete floor outside of the containment area. Additionally, the tanks may still contain waste materials that will require proper disposal.
- Permitting The Site was listed as a National Pollutant Discharge Elimination System (NPDES) facility. This former tenant, Sportrack Automotive at 1721 Dove Street is listed on the NPDES database that identified the Site having a permit to discharge wastewater under Permit Number MIS410519 that was issued 4/1/04 and expired 4/1/09. There was no other information provided. Although this permit does not represent indication of subsurface contamination, proper closure conditions of the permit that was issued by the MDEQ has not been determined.
- Trace amounts of asbestos was identified in a vinyl floor tile on-site. Additionally, based on the age of the Site building, the building materials may contain asbestos.
- 7. October 27, 2009, Nova Phase II ESA for Advanced Accessory Systems located at 1721 Dove Street and 2655 16th Street, Port Huron, Michigan 48060 (Nova 2009 Phase II ESA). This report summarized the soil boring and temporary monitoring well installation activities on the subject property and adjoining Former Advanced Accessory Systems site. The activities conducted on the subject property consisted of the advancement of nine soil boring/temporary monitoring wells and the sampling of six permanent monitoring wells. Soil samples were collected from all of the soil borings. All of the samples were submitted for laboratory analysis of TPH, GRO, and DRO, and five of the nine soil samples were also analyzed for SVOCs and Michigan 10 Metals. All of the groundwater samples



were submitted for laboratory analysis of TPH, GRO, DRO, and VOCs, while seven of the fifteen samples were also analyzed for SVOCs and Michigan 10 metals.

The Nova 2009 Phase II ESA report concluded the following for the subject property:

- Chemical analysis of the soil samples collected from test borings did not detect concentrations of metals, VOCs, or SVOCs above the RBSL. Concentrations of GRO were reported below the laboratory method detection limits (MDLs) with the single exception of one soil sample. Concentrations of DRO ranged from below MDLs to 32,000 mg/Kg in one sample. There is not a RBSL for DRO or GRO. The Chromatogram for the elevated DRO concentrations was indicative of light oil.
- Chemical analysis of the groundwater samples collected from the permanent monitoring wells and temporary wells detected concentrations of dissolved metals and vinyl chloride that exceeded the RBSLs. Chemical analysis of SVOCs indicated that the concentrations in groundwater were below their respective RBSLs.
- Concentrations of GRO were reported below MDLs with the exception of relatively low detections for groundwater samples collected at two temporary wells. Concentrations of DRO were reported for all the groundwater samples analyzed with the exception of the temporary well. Concentrations of DRO ranged from 57 μg/L to 3,700 μg/L. The Chromatogram was again indicative of light oil for these high concentrations.
- Based on the groundwater RBSL exceedances for the dissolved metals and vinyl chloride concentrations along with the relatively high DRO concentrations observed at the site, Nova recommended providing the results of this investigation to the MDEQ to determine if additional investigation is warranted.

The Nova 2009 Phase II ESA report concluded the following for the adjacent 2655 16th Street facility:

- Chemical analysis of the soil samples collected from test borings did not detect concentrations of GRO, metals, VOCs, or SVOCs above the RBSL. Concentrations of DRO were detected above the MDL in only one sample. There is not a RBSL for DRO or GRO. The Chromatogram for the elevated DRO concentrations was indicative of light oil.
- Chemical analysis of the groundwater samples collected from the temporary wells detected concentrations of dissolved lead and vinyl chloride that exceeded the RBSLs.
- Concentrations of GRO were reported below MDLs in all three samples. Concentrations
 of DRO were reported for all the groundwater samples analyzed. The Chromatogram was
 again indicative of light oil for these high concentrations.
- Based on the groundwater RBSL exceedances for the dissolved lead and vinyl chloride concentrations along with the relatively high DRO concentrations observed at the site, Nova recommended providing the results of this investigation to the MDEQ to determine if additional investigation is warranted.

Refer to Appendix 1 for copies of these reports provided by Helios.

- May 2010 FTC&H Phase I ESA update for Former Advanced Accessory Systems 1721 Dove Street, Port Huron, Michigan (FTC&H May 2010 Phase I ESA Update). This report identified the following RECs:
 - The historical use of the subject property by various manufacturing and industrial operations for more than 45 years, and the lack of information regarding the use and storage of hazardous substances, petroleum products and hazardous wastes.
 - The presence of DRO and GRO in the site soils and groundwater indicates releases of hazardous substances or petroleum products have occurred at the subject property.
 - The subject property's classification as a facility, due to the documented presence of VC and PCE in the groundwater at concentrations exceeding Part 201 GRCC.
 - The material threat of a release of hazardous substances and petroleum products to soils beneath oil-stained, cracked concrete floors in several chemical storage areas.

In addition, the following items of environmental concern were noted in the Nova 2009 Phase I ESA and assessed during the FTC&H May 2010 Phase I ESA Update:

- Nova noted several off-specification and/or waste drums, totes, storage tanks, and smaller containers located in the shop area during their assessment. FTC&H confirmed the presence of these waste containers and storage tanks during this Phase I ESA update. The waste containers were staged in the northwest portion of the site building. The concrete floor in the vicinity of the waste accumulation area was observed to be stained from spills or leaks and contained several cracks. The concrete containment area and concrete floor surrounding the storage tanks was stained from leaks or spills and contained several cracks.
- Nova identified potential PCB-containing equipment during their Phase I ESA, including: a pad-mounted transformer, waste compactor, dock levelers, and light ballasts. FTC&H confirmed the presence of the potential PCB-containing equipment during this Phase I ESA update and observed that the equipment was in good shape, with no evidence of releases of hydraulic or dielectric fluids.
- During their Phase I ESA, Nova identified suspect ACMs at the subject property, including: insulation, ceiling tile, drywall assemblies, and flooring and roofing materials. Nova collected representative samples of these materials for asbestos analysis. None of the tested materials were determined to contain regulated levels of asbestos (>1% asbestos by weight). One type of vinyl floor tile was determined to contain asbestos at a concentration less than 1%. Based on the age of the building, additional ACMs may exist. FTC&H conducted a visual assessment of the suspect ACM identified by Nova. There appeared to be no significant changes in condition in the identified materials, and no additional suspect ACM was identified by FTC&H.

Based on the findings of the FTC&H May 2010 Phase I ESA Update, FTC&H recommended the following:

 A Phase II ESA should be conducted to verify the findings of the Nova Phase II ESA conducted on the subject property in October 2009.

- The hazardous and non-hazardous waste materials remaining at the subject property should be properly characterized, labeled, and disposed at appropriate waste disposal facilities in accordance with federal and state regulations.
- Confirmed and suspect ACMs should be managed-in-place in accordance with an Asbestos Operations and Maintenance Program.
- 9. May 2010, FTC&H Phase II ESA for Former Advanced Accessory Systems located at 1721 Dove Street in Port Huron, Michigan 48060 (FTC&H May 2010 Phase II ESA). This report summarized the soil boring and temporary monitoring well installation activities on the subject property. One soil sample was collected from each of the soil borings, and one groundwater sample was collected from each of the temporary and permanent monitoring wells. All of the samples were submitted for laboratory analysis of VOCs (8260 Plus scan), PNAs, and the Michigan 10 Metals (arsenic, barium, cadmium, chromium, copper, lead, mercury, selenium, silver, and zinc). MW-D (MW-8) was only analyzed for VOCs.

FTC&H advanced five soil boring/temporary monitoring wells (SB/TW-1 through SB/TW-5) and collected groundwater samples from five permanent monitoring wells (MW-A, MW-C, MW-D, MW-E, and MW-F). All of the samples were submitted for laboratory analysis of VOCs (8260 Plus scan), PNAs, and the Michigan 10 Metals (arsenic, barium, cadmium, chromium, copper, lead, mercury, selenium, silver, and zinc). Due to slow recovery and the small amount of water present at MW-D, this well was only analyzed for VOCs. The soil boring/temporary monitoring wells were installed at the following locations:

- SB/TW-1: Near a trench drain sump and oil-stained concrete, located in the eastern portion of the building, and in the vicinity of Nova's GP-6 location.
- SB/TW-2: Near the hydraulic oil ASTs and associated stained concrete, located within the building, and adjacent to Nova's GP-2 location.
- SB/TW-3: Near the waste oil pump tank and stained concrete, located near the northwest corner
 of the building, and adjacent to Nova's GP-1 location.
- SB/TW-4: Near the oil house containing the two ASTs, located at the northwest corner of the building, and adjacent to Nova's GP-7 location.
- SB/TW-5: the location of the former UST, along the south side of the building, and adjacent to Nova's GP-9 location.

Based on the analytical results, no soil contaminants that exceeded GRCC were in the soil samples collected from the borings. Vinyl chloride was detected at concentrations exceeding GRCC DWC at temporary monitoring wells TW-2 and TW-5, and permanent monitoring wells MW-C and MW-E. Total chromium was detected at concentrations exceeding GRCC GSIC at temporary monitoring well TW-4, and permanent monitoring wells MW-A and MW-C. Total lead was detected at a concentration exceeding GRCC DWC at temporary monitoring well TW-3.

The FTC&H May 2010 Phase II ESA report concluded the following for the subject property:

• FTC&H has conducted a Phase II ESA for the subject property. The purpose of the Phase II ESA was to further evaluate the RECs identified in FTC&H's May 2010 Phase I ESA. Based on the data collected during this investigation, the subject property is a facility, as defined in Part 201 of the NREPA, P.A. 451 of 1994, as amended, due to the presence of vinyl chloride, chromium, and lead in the groundwater at concentrations exceeding their respective Part 201 GRCC.

A copy of the FTC&H Phase II is included in Appendix 5.

- 10. January 2011, FTC&H Phase I ESA update for Former Advanced Accessory Systems located at 1721 Dove Street, Port Huron, Michigan 48060 (FTC&H January 2011 Phase I ESA Update). This report identified the following RECs:
 - The subject property's classification as a facility, due to the documented presence of vinyl chloride, chromium, and lead in the groundwater at concentrations exceeding Part 201 GRCC.
 - The material threat of a release of petroleum products to soils beneath oil-stained, cracked concrete floors in several areas throughout the subject building.

3.6 REASONS FOR PERFORMING PHASE I ESA

This Phase I ESA was completed to satisfy due diligence requirements prior to acquisition of the subject property by Hoffman.

4.0 SUBJECT PROPERTY DESCRIPTION

4.1 LOCATION AND LEGAL DESCRIPTION

The subject property is located in the southeast quarter of Section 16, Town 6 N, Range 17 E, City of Port Huron, St. Clair County, Michigan (see Appendix 6, Location Map and Site Plan). The property address is 1721 Dove Street, Port Huron, Michigan 48060; and the tax identification number is 06-182-0045-000. The subject property is located within an industrial area of Port Huron. A legal description is included in Appendix 3.

4.2 PHYSICAL DESCRIPTION

The subject property consists of 5.51 acres and contains a 105,773-square-foot, one-story, slab-on-grade, steel-frame industrial building constructed in 1966. The subject property adjoins, and is accessed from, Dove Street, which is present along the south side of the subject property. Additional site improvements include paved parking drives and service areas, landscaping, and loading docks. Hydraulic dock levelers are present at the loading docks.

Utilities supplied to the subject property include: electricity (DTE Energy), potable water and sewer (City of Port Huron), and natural gas (SEMCO). The office portion of the building is heated/cooled with a combined forced natural gas/heat pump system. The shop area is heated with ceiling-mounted, natural gas unit heaters and cooled with ventilation fans. Water and sanitary sewer services have been supplied to the subject property by municipal authorities since its construction.

4.3 FACILITY OPERATIONS

The subject property is currently vacant, but was previously occupied by various automobile part manufacturers including, most recently, fabricators of metal roof rack systems. The manufacturing processes included the use and storage of several petroleum and chemical based products and wastes, which will be discussed throughout this report.

4.4 CURRENT USES OF ADJOINING PROPERTIES

Adjoining properties were viewed from the subject property and/or public roadways. The area in the general vicinity surrounding the subject property is occupied by light industrial and warehouse facilities. Current uses of the adjoining properties include:

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North: Former Advanced Accessory Systems, 2655 16th Street location.

South: Dove Street, then Earl C. Smith Distributing and the Pro-Weld facility.

East: Former The Crown Group Port Huron (vacant).

West: DHL Global Forwarding and the Norman Jensen Warehouse facility.

5.0 ENVIRONMENTAL SETTING

5.1 TOPOGRAPHY AND SURFACE WATER

The USGS topographic map, Port Huron, Michigan Quadrangle, 1991 (provided in Appendix 7) indicates the surface elevation of the subject property is approximately 605 feet amsl. The closest surface water body is the St. Clair River, located approximately 0.35 mile southeast of the subject property.

Based on the Nova 2009 Phase I ESA report, wetlands are not mapped on the subject property or adjoining properties on the United States Fish and Wildlife Service Wetlands Geodatabase. Formal wetlands delineation has not been conducted on the subject property.

5.2 SOILS

According to the FTC&H May 2010 Phase II ESA report, in general, the soils encountered at the subject property consisted of fine- to medium-grained brown sand to termination of the borings (10 feet bgs).

5.3 HYDROGEOLOGY

According to the Nova 2009 Phase I ESA report:

- The subject property is situated on the northeastern portion of the Interior Plains Province, directly southeast of the Michigan Basin.
- The bedrock formation beneath the subject property consists of the Mississippian-Devonian, Bedford and Antrim Shale formation. The Bedford Shale is estimated to be located between 112 to 132 feet bgs, and the Antrim Shale is estimated to be located between 132 to 272 feet bgs.
- Up to 200 feet of glacial till is deposited above the bedrock surface. The glacial tills typically contain sand and a confining clay bed that overlie the bedrock layer.
- No water well records were available for the subject property. According to a nearby Water Well and Pump Record obtained from the MDNRE (now the MDEQ) Well Record Retrieval System (via the internet), there is 12 feet of sand that overlies a 100-foot layer of blue clay.



According to the FTC&H May 2010 Phase II ESA report, groundwater was encountered on the subject property at depths ranging from approximately 5 to 5.8 feet bgs. If regional groundwater flow mimics surface topography, groundwater would be expected to flow to the southeast, toward the St. Clair River.

6.0 SUBJECT PROPERTY HISTORY

The readily available historical information consisting of aerial photographs, city directories, and assessor records were reviewed to evaluate the previous uses of the subject property. Information reviewed for this project is listed in the Reference Section, and exceptions to ASTM requirements for review of historical information are described in Section 1.6 of the Nova 2009 Phase I ESA.

According to the historical records, the subject property was undeveloped land in 1938 and remained so until construction of the current manufacturing facility began in 1966. Research indicates the current facilities were constructed in phases between 1966 and 1981, as follows: According to the field sheet, the southernmost half of the southern half of the main eastern shop area (19,348 square feet) and office was constructed in 1966, and the northern half of the southern half of the main eastern shop area (14,510 square feet) was constructed in 1967. The northern half of the main eastern shop area (34,668 square feet) was constructed in 1971. The western addition (17,160 square feet) to the north half of the main eastern shop area was constructed in 1972. The far western L-shaped addition (13,201 square feet) to the north half of the main eastern shop area was constructed in 1981. The structure connecting the 2655 16th Street facility and the northeastern corner of the main eastern shop area was constructed in 1990.

The following addresses were determined to have historically corresponded to the subject property: 1721 and 1723 Dove Street. The directories listed the operators of the subject property from 1968 to the present as follows:

- 1968 Huron Manufacturing 1723 Dove Street
- 1974 St. Clair Metal Products 1721 Dove Street
- 1980 Huron St. Clair (Division of Masco) 1721 Dove Street
- 1986 St. Clair Metal Products 1721 Dove Street
- 1992 Huron St. Clair (Division of Masco) 1721 Dove Street
- 1998 Non-Published 1721 Dove Street
- 2004 Sport Rack Automotive 1721 Dove Street

7.0 SURROUNDING PROPERTIES HISTORY

The readily available historical information consisting of aerial photographs, city directories, and assessor records indicates the surrounding properties were generally vacant land as far back as 1937, until development of the warehouse and manufacturing facilities began in the late 1960s. The surrounding parcels are summarized as follows:

North: The land to the northwest has been undeveloped since at least 1937. The land to the northeast (2655 16th Street) was vacant land until development as a manufacturing facility started in 1968. This facility has operated as an Advanced Accessory Systems 'sister' plant to the subject property.

East: The land to the east was vacant land until development of a manufacturing facility started between 1964 and 1968.

South: The land to the south and southeast was vacant land until it was developed as a warehouse and distribution facility starting in 1964. Refer to Section 8 of this update for more information on the regulatory status of these sites.

West: The land to the west was vacant land until it was developed as a warehouse and manufacturing facility to the southwest between 1964 and 1968. Construction of a larger warehouse to the northeast took place between 1992 and 2000.

8.0 RECORDS REVIEW

8.1 DATABASE REVIEW

EDR was retained to conduct a computerized search of publicly available regulatory databases. The EDR report included a review of Standard Environmental Record Sources located within their respective Approximate Minimum Search Distance as described in the ASTM Standard. EDR summarized the results of their review in a report, included in Appendix 8. A summary of the information in the EDR report for the subject property is as follows:

- RCRA-CESQG This property was registered in the RCRA-CESQG database, which indicates that
 the user of the property generates less than 100 kg of hazardous waste per month, or less than 1 kg
 of acutely hazardous waste per month. No violations were listed for the subject property. This listing
 is not considered significant to the subject property.
- SHWS This property was listed in the SHWS database. It states that the source of contamination is
 miscellaneous metal work, and no actions have been taken to address contamination. This listing is
 considered significant to the subject property.
- UST Five USTs were located on the site including:
 - One 16,000-gallon UST, reportedly used to store diesel and water, was removed on September 1, 1984.
 - Two 1,200-gallon USTs, used to store a "hazardous substance," were removed on May 1, 1978.
 - One 1,000-gallon UST, used to store a "hazardous substance," was removed on November 1, 1988.
 - One 1,100-gallon UST, used to store water, was removed on March 26, 1986.

All of the tanks were reportedly located in the southeast portion of the subject property and have been removed from the ground. A release was reported from the two 1,200-gallons USTs, which were used to store toluene; therefore, the USTs are considered significant. Details of this release have been previously discussed in this report.

 LUST – This property is listed as a LUST site (C-0288-89), and the substance released was not reported. The site was closed on September 24, 2004, with a restrictive covenant restricting groundwater use in a portion of the property. Since a restrictive covenant was placed on the subject property, this listing is considered significant to the subject property.

- NPDES The subject property was also identified on the NPDES database, which indicated that
 Advanced Accessory Systems received a COC permit in July 2009. Facilities that are determined to
 be eligible for coverage under a general industrial storm water permit in the NPDES receive a COC. A
 general permit is designed to cover permittees with similar operations and/or types of discharge.
 General permits contain effluent limitations protective of most surface water statewide. This listing is
 considered significant to the subject property.
- AIRS The subject property was identified on the AIRS database, which identifies sites that have an air permit and are required to track their air emissions in an inventory. The database identified the subject property as St. Clair Metal Products and that a record was created on December 9, 1977. No additional information was provided in the database. The MDEQ-AQD was contacted via FOIA request on March 22, 2012, for information on this permit. The MDEQ stated in an e-mail dated March 30, 2012, that they have no record for this property. This listing is not considered significant to the subject property.
- BEA A BEA, conducted by FTC&H, was submitted by NAI Farbman to the MDEQ on February 9, 2011, for the subject property. The BEA was submitted because the subject property was determined to be a facility during the May 2010 FTC&H Phase II ESA, due to the presence of vinyl chloride, total chromium, and total lead identified in groundwater at concentrations exceeding GRCC.

The EDR report identified six LUST sites within a ½-mile radius of the subject property. Four of the sites have been closed by the MDEQ. Two sites remain open: Blue Water Area Trans Commission (release from a former 12,000-gallon diesel fuel UST that was removed in March 2000), which is located approximately 0.14 mile south of the subject property; and a 6.5-acre vacant parcel (release from a former 500-gallon gasoline UST removed in December 2000), which is located approximately 0.39 mile south of the subject property. Both sites are located hydraulically downgradient of the subject property and are, therefore, not significant to the subject property.

Four SHWS were identified within a 1-mile radius of the subject property. None of the sites have the potential to have an adverse impact on the subject property.

Based on a review of the EDR report, the following sites were identified as having the potential to adversely impact the subject property:

2654 20th **Street** – Wirtz Manufacturing Company was listed on the RCRA-NonGen list. No violations were listed for the site; therefore, this site is not considered significant to the subject property.

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1631 Dove Street – The Crown Group was listed on the RCRA-NonGen list and was previously a RCRA-LQG. Several violations were listed for the site; however, compliance was achieved with each violation. Therefore, this site is not considered significant to the subject property.

1720 Dove Street – Pro Weld, Incorporated was listed on the RCRA-NonGen list. No violations were listed for the site; therefore, this site is not considered significant to the subject property.

1730 Dove Street – Earl Smith Distributing Company was listed on the RCRA-CESQG. No violations were listed for the site; therefore, this listing is not considered significant to the subject property.

2655 16th **Street** – A BEA was submitted by NAI Farbman to the MDEQ on February 9, 2011, for this site. The BEA was submitted because the property was determined to be a *facility* due to the presence of TCE identified in soil at concentrations exceeding GRCC. Since contamination at this site appears to be limited to soils, it is not considered significant to the subject property.

8.2 MDEQ FILE REVIEW

Based on the historical data for the former Advanced Accessory Systems property at 1721 Dove Street, and for the potential of 2655 16th Street, Port Huron, Michigan, to impact the subject property, a FOIA request was submitted to the MDEQ (RD, RMD, WRD, and/or AQD) for both properties regarding any information that has been provided to the MDEQ since December 2010. FOIA information prior to December 2010 was provided in the January 2011 FTC&H Phase I update for the subject property (included in Appendix 1).

Based on the MDEQ responses, the only additional information submitted to the MDEQ since December 2010 is the BEA for the 2655 16th Street property. FTC&H did not receive a response from the MDEQ-RD regarding the BEA submitted for 1721 Dove Street; however, a BEA was submitted by FTC&H in February 2011.

8.3 HEALTH DEPARTMENT

On March 22, 2012, the St. Clair County Health Department (SCCHD) was contacted by FOIA request for information on the subject property particularly related to environmentally related incidents (chemical spills or releases) in the areas of air quality, surface water, groundwater, hazardous, and solid waste that have occurred at the site. On March 26, 2012, a telephone response was received from the SCCHD via voicemail indicating no files existed for the subject property.

9.0 SITE RECONNAISSANCE

Mr. Campbell conducted a site reconnaissance of the subject property on March 30, 2012. FTC&H was accompanied during the site reconnaissance by Mr. John McMann. Mr. McMann represents the security company that is present 24 hours per day and conducts site walk-throughs several times per day. The site reconnaissance included an inspection of interior and exterior building areas and the outside areas of the subject property. Adjacent properties were viewed from the subject property. Photographs taken during the reconnaissance are included in Appendix 9. The site reconnaissance was limited by paved and vegetated areas. A summary of observations made during the reconnaissance is provided below.

9.1 FACILITY OBSERVATIONS

9.1.1 GENERAL SITE SETTING

The subject property consists of 5.51 acres and contains a 105,773-square-foot, one-story, slab-on-grade, steel-frame industrial building constructed in 1966. Additional site improvements include paved parking, drives, service areas, landscaping, and loading docks. Refer to the Site Plan in the Nova 2009 Phase I ESA for a detailed layout of the subject building (Appendix 1).

9.1.2 POTABLE WATER

The subject property has been supplied potable water by the City of Port Huron (currently shut off) since its construction.

9.1.3 WASTEWATER/STORM WATER

All sanitary wastewater from the subject property is conveyed to the City of Port Huron sanitary sewer system.

The subject property is currently vacant; therefore, it produces no process-related wastewater.

Storm water on the subject property is directed toward the onsite catch basins that are connected to the municipal storm sewer system, which is treated prior to discharge to the St. Clair River. When the facility was operating, the storm water was discharged under a NPDES General Permit for Storm Water from Industrial Activities (MIS 410000), certificate of coverage number MIS410519. There was no information in MDEQ files indicating this permit has been terminated.

9.1.4 DRAINS OR SUMPS

In addition to the observations made in the Nova 2009 Phase I ESA, a trench drain system was observed inside the eastern portion of the northeast shop area (refer to the Site Plan in the Nova 2009 Phase I ESA). These trenches contained several inches of oil and were most likely a collection system for hydraulic oil coming off the presses used in the manufacturing process. The trench drains drained to a large sump that pumped the fluids through overhead piping to the hydraulic fluid AST, located in the approximate center of the building. The integrity of this system is unknown, and significant oil staining was observed throughout the concrete area around the oil collection system.

9.1.5 STAINS, CORROSION, OR ODORS

In addition to the evidence of spills, leaks, and overflows described in Section 4.5 of the Nova 2009 Phase I ESA, significant oil staining was observed throughout the concrete area around the oil collection system, as described above.

9.1.6 HEATING AND COOLING

The office portion of the subject building is heated and cooled with a forced-air natural gas/heat pump system; the manufacturing/shop portions are heated with ceiling-mounted, natural gas unit heaters and cooled with ventilation fans.

9.1.7 SOLID WASTE/FILL MATERIAL

No significant fill material was observed on the subject property.

9.1.8 PITS/PONDS/LAGOONS

No pits, ponds, or lagoons were observed on the subject property or adjoining properties.

9.1.9 STAINED SOIL OR PAVEMENT

No stained soils were observed on the subject property, and only minimal stained pavement was observed on the asphalt drive and parking areas.



9.1.10 STORAGE TANKS

Two approximately 5,000-gallon non-hazardous waste oil fluid ASTs were observed in the oil shed located at the northwest portion of the building. The tanks are within a concrete containment structure. An approximate 100-gallon hydraulic oil AST used for the trash compactor was observed along the interior west wall of the building.

9.1.11 HAZARDOUS SUBSTANCES OR PETROLEUM PRODUCTS

FTC&H observed two approximately 5,000-gallon waste oil ASTs located in the oil shed, near the northwest portion of the building. Additionally, an approximate 100-gallon hydraulic oil tank, used for the trash compactor, was located along the western wall of the building. A waste oil collection sump was observed in the building.

9.1.12 HAZARDOUS OR NON-HAZARDOUS WASTE

The hydraulic fluid containers described in Section 9.1.10 and 9.1.11 would be considered non-hazardous waste. No hazardous waste was observed on the subject property.

9.1.13 ENVIRONMENTAL PERMITS

Currently, there are no environmental permits for the subject property. However, during its historical occupancy, it had five UST permits, a NPDES permit, and was a RCRA-CESQG.

9.1.14 HYDRAULIC OR ELECTRICAL EQUIPMENT (PCBs)

One pad-mounted, utility-owned transformer was observed in the north portion of the subject property. The transformer was labeled non-PCB containing. One large, pad-mounted, site-owned transformer was observed in the southeast portion of the subject property. This transformer was not labeled non-PCB containing. In addition, the hydraulic levelers in the loading dock area, the trash compactor, and light ballasts throughout the subject property have the potential to contain PCBs. However, all of these appeared to be in good condition, with no evidence of leaks or spills

9.1.15 SENSITIVE RECEPTORS/WETLANDS

No low-lying (wetland) areas were observed on the subject property.

10.0 INTERVIEWS

10.1 INTERVIEW WITH OWNER

An interview was conducted by e-mail on April 14, 2012, with Mr. Kevin Dohany, Property Manager for the Farman Group, regarding the environmental conditions associated with the subject property. Mr. Dohany has been familiar with the subject property since 2011. According to Mr. Dohany, the subject property is a currently vacant manufacturing/warehousing building used historically for the same purposes. He was unaware of the property's former wastewater systems, or of the current or former hazardous substance/petroleum product use and storage on the property. A copy of the interview questions and answers is located in Appendix 10.

10.2 INTERVIEW WITH SITE/PROPERTY MANAGER

Mr. John McMann, the subject property's security guard, was interviewed on March 30, 2012, regarding the environmental conditions associated with the subject property. The interview was conducted in person at the time of the site reconnaissance. Mr. McMann has been familiar with the subject property for approximately three years.

According to Mr. McMann, the subject property is generally unchanged since April 2010. There has been no illegal dumping, burying, or burning incidents on the subject property. Several drums of hazardous materials and petroleum products, formerly stored onsite, were removed since FTC&H was onsite for the 2011 Phase I ESA. Mr. McMann stated that the condition of the subject property has continued to deteriorate with time and little to no maintenance. The roof leaks, which causes more paint to peel off the metal ceilings and more water to pool on the inside floor areas. Mr. McMann explained that there has been one break-in to the adjoining 16th Street former Advanced Accessory Systems building, during which an individual began to remove the copper conduit from the ceiling in the main shop area, until disrupted by Mr. McMann, and the police were called. Mr. McMann had no additional information on the subject property. A copy of the interview questions and answers is located in Appendix 10.

10.3 INTERVIEWS WITH OCCUPANTS

The subject property is vacant/unoccupied.



10.4 INTERVIEWS WITH OTHERS

No other individuals were identified for an interview regarding the subject property.

11.0 FINDINGS

The subject property is situated on approximately 5.51 acres and contains a 105,773-square-foot industrial building occupied by various manufacturing/industrial businesses since 1965.

There have been several previous environmental assessments and investigations on the subject property. These assessments have identified RECs, including that two former toluene USTs that historically leaked some of their contents into the subsurface onsite; that contaminants such as PCE and vinyl chloride are present above the applicable cleanup criteria in the subject property groundwater; oil stained concrete and asphalt exists inside and outside the subject building; and the existence and improper storage of hazardous substances and petroleum products.

The Nova 2009 Phase I ESA also identified the following additional, non-ASTM Phase I ESA scope, environmental concerns associated with the subject property: the eleven groundwater monitoring wells that remain onsite are not in a secure location and are subject to vandalism; evidence of spills, leaks, and overflows around the drum accumulation area in the northwest shop area, and around the 2,500-gallon waste oil/water ASTs outside; the off-specification waste drums, totes, and storage tanks that remain onsite; the lack of information regarding the facility's NPDES permit; and the trace amount of asbestos identified in a vinyl floor tile within the building.

The most recent soil and groundwater analytical results collected for the FTC&H May 2010 Phase II ESA, indicated the subject property is a *facility*, as defined in Part 201 of the NREPA, P.A. 451 of 1994, as amended, due to the presence of vinyl chloride, chromium, and lead in the groundwater at concentrations exceeding their respective Part 201 GRCC.

The subject property was identified on the LUST, SHWS, NPDES, RCRA Generators, and BEA regulatory databases. The LUST listing is associated with the two toluene USTs identified above. This investigation was closed in 2004 through a deed restriction on the site's groundwater use. The SHWS listing is associated with the elevated levels of vinyl chloride and PCE detected in the site groundwater during the toluene LUST investigation. No actions have been taken to address this contamination. The NPDES listing is a permit related to the former storm water discharge to the St. Clair River. The RCRA generator listing is associated with the site's former generation of hazardous wastes at a CESQG status. No waste violations were identified in the regulatory database search performed by EDR. The BEA listing is related to a former occupant's submittal of a Category D BEA.

During the site reconnaissance, a trench drain system that contained several inches of oil was observed in the east section of the shop portion of the subject building. This trench system was most likely constructed to collect leaking hydraulic fluid from presses used in the manufacturing process. The oils



drained to a sump that pumped collected oil through overhead piping to a former AST located in the approximate center of the subject building. Significant oil staining was observed on the concrete floors surrounding the trench drain system and the former AST. The concrete floor in the vicinity of the former AST appeared to be in poor condition, while the integrity of the trench drain system could not be determined.

During the site reconnaissance, a belowground waste oil pump tank was observed in the northwest corner of the subject building. The waste oil pump tank served as an interior collection point for waste oil and water that was connected via overhead piping to the two approximate 5,000-gallon waste oil ASTs within the exterior oil house. The hazardous substances and petroleum products were a part of the manufacturing processes onsite. The ASTs were part of the onsite wastewater treatment system described above. Significant pools of oil and concrete staining from leaks and/or spills was observed in the waste oil pump tank area, surrounding the miscellaneous containers, and within the AST secondary containment structure in the exterior oil house. The integrity of the waste oil pump tanks could not be determined, as they were covered with oil and water.

Also during the site reconnaissance, Eleven groundwater monitoring wells from the former LUST investigation activities were observed in the southern portion of the subject property. Some of these wells were observed to be flush with the ground while others were aboveground. Most of the wells were located outside the fenced area, but did not appear to have been tampered with.

The subject property is surrounded by industrial properties that were developed during the same time frame. Manufacturing and industrial facilities, in general, use and store hazardous substances and petroleum products, as well as generate hazardous wastes. Several of the adjoining and immediately surrounding sites were identified as RCRA generators and/or were listed on the LUST and UST databases. The RCRA generator sites either had no regulatory violations reported, or provided the appropriate documentation to correct them. All but two of the LUST investigations have been closed; the one open release is located at a hydraulically downgradient position, more than 0.1 mile from the subject property.



12.0 DATA GAP ANALYSIS

FTC&H was unable to interview any prior occupants of the subject property during the course of this investigation. It is unlikely the occupants would have any additional knowledge of the subject property that was not determined through the historical research, regulatory file review, and site reconnaissance conducted as a part of this Phase I ESA. Therefore, this data failure is not considered a significant data gap.

The lack of information regarding the complete use and historical storage of hazardous materials and petroleum products on the subject property is a significant data gap.



13.0 OPINIONS

The historical use of the subject property by various manufacturing and industrial operations for more than 45 years, and the lack of information regarding the use and storage of hazardous substances, petroleum products, and hazardous waste has been investigated through the Nova 2009 and FTC&H May 2010 Phase II ESA soil and groundwater sampling activities conducted on the subject property and is, therefore, not considered a REC.

The subject property is listed on the SHWS database due to the elevated levels of vinyl chloride and PCE detected in the site groundwater during the toluene LUST investigation. No actions have been taken to address this contamination. The subject property's classification as a *facility*, due to the documented presence of vinyl chloride and PCE from this listing and from vinyl chloride, chromium, and lead detected during the FTC&H May 2010 Phase II ESA activities, at concentrations exceeding Part 201 GRCC, is considered a REC.

The subject property is listed on the LUST database with a closed status. The site achieved regulatory closure in 2004 through a deed restriction on the site's groundwater use and, therefore, does not represent a REC to the subject property.

The RCRA generator listing for the subject property is associated with the site's former generation of hazardous wastes at a CESQG status. No waste violations were identified in the regulatory database search performed by EDR. The listing of the subject property as a RCRA-CESQG, without evidence of a release of hazardous wastes, is not a REC.

Significant oil-staining and pooled oil was observed on concrete floors in the vicinity of several hazardous substance and petroleum product use and storage areas on the subject property, including: the hydraulic oil trench drain system; the former waste hydraulic fluid ASTs; the waste oil pump tank area; the former chemical container storage area; and the waste oil ASTs within the exterior oil house. The concrete floor throughout the building was observed to have cracks, which represent a possible migration pathway to soils beneath the building. Soil and groundwater sampling activities during the FTC&H May 2010 Phase II ESA were conducted beneath the stained concrete floors in the building. However, the sampling was limited and did not fully define the possible extent of contamination that may have resulted from releases of materials through the cracks in the concrete floor. The material threat of a release of hazardous substances and petroleum from these containers remains, and is considered a REC.

None of the sites of known or potential contamination identified in the regulatory database search were determined to have the potential to cause environmental impact to the subject property and are, therefore, not considered to be a REC.

14.0 CONCLUSIONS

FTC&H has performed a Phase I ESA in conformance with the scope and limitations of the ASTM Standard at the Former Advanced Accessory Systems site located at 1721 Dove Street, Port Huron, Michigan, the subject property. Any exceptions to, or deletions from, this practice are described in the Limitations and Exceptions section of this report. This assessment has revealed no evidence of RECs in connection with the subject property, except the following:

- A. The subject property's classification as a *facility*, as defined in Part 201 of the NREPA, P.A. 451 of 1994, as amended, due to the documented presence of vinyl chloride, chromium, and lead in the groundwater at concentrations exceeding Part 201 GRCC.
- B. The material threat of a release of hazardous substances and petroleum products to soils beneath oil-stained, cracked concrete floors in several chemical storage areas.



15.0 DEVIATIONS

In the process of conducting this Phase I ESA, the following deviations were made from the ASTM Standard:

- A. The State of Michigan does not publish two separate lists that are directly comparable to the NPL and CERCLIS listings. Michigan compiles a List of Contaminated Sites, which includes both sites that have been investigated and those requiring investigation. This one list serves the purpose of both the CERCLIS and NPL lists on a state level.
- B. In an effort to provide a more concise and usable document, FTC&H has deviated from the report format recommended in the ASTM Standard. The FTC&H format is cross referenced to the ASTM Standard format on a checklist provided in Appendix 11.



16.0 ADDITIONAL SERVICES

No additional services were requested as part of this Phase I ESA.

17.0 REFERENCES

17.1 LISTINGS

EDR Radius Map with GeoCheck[®], Former Advanced Accessory Systems, 1721 Dove Street, Port Huron, Michigan 48060, March 21, 2012.

17.2 HISTORICAL RESOURCES

ASTM Standard E 1527-05, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

CRA, LUST Closure Report for SportRack Automotive (formerly MascoTech Accessories), September 13, 2004.

EMG Corporation, Phase I ESA of Advanced Accessory Systems, August 12, 2004.

Malcolm Pirnie, ESA Update of SportRack Automotive, October 30, 2002.

Nova, Phase I ESA for Advanced Accessory Systems, September 7, 2009.

Nova, Phase II ESA for Advanced Accessory Systems located at 1721 Dove Street and 2655 16th Street, Port Huron, Michigan 48060, October 27, 2009.

PSI, Operations & Maintenance Plan for Asbestos-Containing Materials, October 7, 2003.

U.S. Department of the Interior, Geological Survey Division, Port Huron Quadrangle, 7.5-Minute Series (Topographic), dated 1991.

FTC&H, Phase I ESA for Former Advanced Accessory Systems Property, May 2010.

FTC&H, Phase II ESA for Former Advanced Accessory Systems Property, May 2010.

FTC&H, Phase I ESA Update for Advanced Accessory Systems Property, January 24, 2011.

17.3 PERSONAL COMMUNICATIONS

Mr. Lowell Cameron, St. Clair County Health Department, March 26, 2012.

City of Port Huron Clerk's Office, March 29, 2012.

Mr. John McMann, security guard, March 30, 2012.

Mr. Kevin Dohany, Director of Facilities for Farbman Group, April 14, 2012.

18.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

We declare that, to the best of our professional knowledge and belief, we meet the definition of an Environmental Professional, as defined in 40 CFR §312.10.

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the *all appropriate inquiries* in conformance with the standards and practices set forth in 40 CFR Part 312.

| Assessment Conducted By: | Assessment Reviewed By: | |
|--------------------------|-------------------------|--|
| Todd C. Campbell, CPG | Thomas M. Budge, CHMM | |

Qualification statements for the FTC&H personnel responsible for conducting this Phase I ESA are provided as Appendix 12.

Appendix 1

Phase I Environmental Site Assessment Update

Former Advanced Accessory Systems 1721 Dove Street Port Huron, Michigan 48060

Prepared for: NAI Farbman Southfield, Michigan

January 24, 2011 Project No. G100168



PHASE I **ENVIRONMENTAL SITE ASSESSMENT** UPDATE

FORMER ADVANCED ACCESSORY SYSTEMS **1721 DOVE STREET** PORT HURON, MICHIGAN 48060

PREPARED FOR: NAI FARBMAN SOUTHFIELD, MICHIGAN

JANUARY 24, 2011 PROJECT NO. G100168

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LIST OF ABBREVIATIONS/ACRONYMS

AAI Appropriate Inquiry, in compliance with 40 CFR 312

ACM asbestos containing material

AIRS Permit and Emissions Inventory Data

amsl above mean sea level

AQD Air Quality Division of the MDNRE (previously the MDEQ and MDNR)

AST aboveground storage tank

ASTM American Society for Testing and Materials

AULs activity and use limitations

BEA Baseline Environmental Assessment

bgl below ground level bgs below ground surface

BOD biochemical oxygen demand

BTEX benzene, toluene, ethylbenzene, and xylenes

BTX benzene, toluene, xylenes

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CERCLIS Comprehensive Environmental Response, Compensation, and Liability Information System

CESQG Conditionally Exempt Small Quantity Generator

CFR Code of Federal Regulations COC Certificate of Coverage

CORRACTS facilities subject to Corrective Action under RCRA

DCA dichloroethane DCE dichloroethene

DRO Diesel Range Organics EC engineering controls

EDR Environmental Data Resources, Inc.

EPA see USEPA

EPCRA Emergency Planning and Community Right to Know Act

ERNS Emergency Response Notification System

ERO extended range organics

ESA Environmental Site Assessment

ESE east-southeast

facility A "facility" is defined by Part 201 of Michigan Public Act 451, 1994, as amended, as any

area, place or property where hazardous substance in excess of the established state cleanup standard for residential property has been released, deposited, disposed of, or

otherwise comes to be located

FEMA Federal Emergency Management Agency

FINDS Facility Index System

FOIA U.S. Freedom of Information Act

FR Federal Register

ft foot/feet

FTC&H Fishbeck, Thompson, Carr & Huber, Inc. GRCC Generic Residential Cleanup Criteria

GRO Gasoline Range Organics

HVAC heating, ventilating, and air conditioning

IC institutional controls

LEPC local emergency planning commission LLPs Landowner Liability Protections

LQG large quantity generator

LUST leaking underground storage tank

MDEQ Michigan Department of Environmental Quality (now the MDNRE)

MDL Method Detection Limits

MDNR Michigan Department of Natural Resources (now the MDNRE)

MDNRE Michigan Department of Natural Resources and Environment (previously the MDEQ and MDNR)

MEK methyl-ethyl ketone mg/kg milligrams per kilogram MSDS material safety data sheet

fTC&h

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MTBE methyl tert butyl ether MW monitoring well

NCP National Contingency Plan

NE northeast

NFRAP former CERCLIS sites where no further remedial action is planned under CERCLA

NonGen nongenerator of hazardous waste

NPDES National Pollution Discharge Elimination System

NPL National Priorities List NRC National Response Center

NREPA National Resources and Environmental Protection Act

NW northwest P.A. Public Act

PACM presumed asbestos containing material

PADS PCB Activity Data System - PADS identifies generators, transporters, commercial storers

and/or brokers and disposers of PCBs who are required to notify the USEPA of such

activities

PAH polyaromatic hydrocarbon

Part 201 Part 201 (Environmental Remediation) of the Natural Resources and Environmental

Protection Act, 1994 of Public Act 451, as amended (NREPA)

Part 213 Part 213, Leaking Underground Storage Tanks, of the Natural Resources and

Environmental Protection Act, 1994 of Public Act 451, as amended (NREPA)

PCBs polychlorinated biphenyls

PCE tetrachloroethene (or) tetrachloroethylene

PID photoionization detector

PIPP Pollution Incident Prevention Plan polynuclear aromatic hydrocarbons

ppb parts per billion ppm parts per million

PRP potentially responsible party

PVC polyvinyl chloride

RBCA Risk Based Corrective Action
RBSL Risk Based Screening Levels

RCRA Resource Conservation and Recovery Act

REC recognized environmental condition

RRD Remediation and Redevelopment Division of the MDNRE (previously the MDEQ and MDNR)

SARA Superfund Amendments and Reauthorization Act

SERC State Emergency Response Commission

sf square foot/feet

SHWS State Hazardous Waste Site SQG small quantity generator

SSE south-southeast south-southwest

SVOC semivolatile organic compound

SW southwest

SWF/LF Solid Waste Facility/Landfill TCA 1,1,1-trichloroethane

TCE trichloroethene (or) trichloroethylene

TMB trimethylbenzene

TPH total petroleum hydrocarbons

TSDF treatment, storage, or disposal facility

µg/L microgram per liter
µg/mg microgram per milligram
µg/kg microgram per kilogram

USC U.S. Code

USDA U.S. Department of Agriculture

USEC/IC U.S. Engineering Controls/Institutional Controls

USEPA U.S. Environmental Protection Agency

USGS U.S. Geological Survey



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UST underground storage tank

VC vinyl chloride

VOC

WB

volatile organic compound
Water Bureau of the MDNRE (previously the MDEQ and MDNR)
Waste and Hazardous Materials Division of the MDNRE (previously the MDEQ and MDNR) WHMD



1.0 SUMMARY

FTC&H has performed a Phase I ESA Update on the Former Advanced Accessory Systems site located at 1721 Dove Street in Port Huron, Michigan 48060 (subject property). This Phase I ESA Update was conducted in conformance with the scope and limitations of ASTM Standard Practice E 1527-05 (ASTM Standard), and constitutes all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice, as defined in *Standards and Practices for All Appropriate Inquiries* (AAI) (40 CFR Part 312). This report is an update to the May 2010 Phase I ESA update conducted on the subject property by FTC&H and to the September 7, 2009, Phase I ESA conducted on the subject property by Nova Consulting Group, Inc (Nova) (both provided as Appendix 1).

The purpose of this assessment is to determine if RECs exist on the subject property and to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability.

The subject property consists of 5.51 acres and contains a 105,773 sf, one-story, steel framed, slab-on-grade industrial building and associated drive, parking, and landscaped areas. During the course of this investigation, FTC&H encountered evidence of the following RECs in connection with the subject property:

- A. The subject property's classification as a *facility*, due to the documented presence of vinyl chloride, chromium, and lead in the groundwater at concentrations exceeding Part 201 GRCC.
- B. The material threat of a release of hazardous substances and petroleum products to soils beneath oil-stained, cracked concrete floors in several chemical storage areas.

In addition, the following items of environmental concern were noted in the Nova Phase I ESA (2009) and assessed during FTC&H's Phase I ESA Updates (May 2010 and current):

• Nova noted several off-specification and/or waste drums, totes, storage tanks, and smaller containers located in the shop area during their assessment. FTC&H confirmed the presence of these waste containers and storage tanks during the May 2010 Phase I ESA update. The waste containers were staged in the northwest portion of the subject building. The concrete floor in the vicinity of the waste accumulation area was observed to be stained from spills or leaks and contained several cracks. The concrete containment area and concrete floor surrounding the storage tanks was stained from leaks or spills and contained several cracks.

- Nova identified potential PCB-containing equipment during their Phase I ESA, including: a
 pad-mounted transformer, waste compactor, dock levelers, and light ballasts. FTC&H confirmed the
 presence of the potential PCB-containing equipment during this Phase I ESA Update and observed
 that the equipment was in good shape, with no evidence of releases of hydraulic or dielectric fluids.
- During their Phase I ESA, Nova identified suspect ACMs at the subject property, including: insulation, ceiling tile, drywall assemblies, and flooring and roofing materials. Nova collected representative samples of these materials for asbestos analysis. None of the tested materials were determined to contain regulated levels of asbestos (>1% asbestos by weight). One type of vinyl floor tile was determined to contain asbestos at a concentration less than 1%. Based on the age of the building, additional ACMs may exist. FTC&H conducted a visual assessment of the suspect ACM identified by Nova. These materials appeared to have degraded slightly since April 2010 based on the lack of maintenance to the building. However, no additional suspect ACM was identified by FTC&H.

1.1 RECOMMENDATIONS

Based on the findings of this Phase I ESA Update, FTC&H recommends the following:

- A. The hazardous and non-hazardous waste materials remaining at the subject property should be properly characterized, labeled, and disposed at appropriate waste disposal facilities in accordance with federal and state regulations.
- B. Confirmed and suspect ACMs should be managed-in-place in accordance with an Asbestos Operations and Maintenance Program.
- C. A Baseline Environmental Assessment and a Section 7a Compliance Analysis/Due Care Plan be conducted by NAI Farbman prior to receivership of the subject property according to Part 201 of the NREPA, Michigan Public Act 451, 1994 as amended.
- D. Determine with the MDNRE if the onsite groundwater monitoring wells associated with the former LUST investigation can be decommissioned and if so, have them properly abandoned by a licensed well driller.
- E. Verify the onsite pad-mounted transformer is non-PCB containing and affix the proper labeling. Continue to maintain and monitor the transformer, trash compactor and dock levelers for evidence of damage, leaks or spills. Immediately clean up any spills and repair any leaks or damages to this equipment upon detection. Prior to the removal of any light ballasts onsite, determined if they contain PCBs and, if so, store them according to federal, state, and local regulations until a PCB waste licensed transporter removes them to an appropriate disposal facility.

2.0 INTRODUCTION

2.1 PURPOSE

This document presents the results of a Phase I ESA Update to the May 2010 Phase I ESA update conducted on the subject property by FTC&H and to the September 7, 2009, Phase I ESA conducted on the subject property by Nova (both provided as Appendix 1). This assessment was conducted by Ms. Sara M. Looney on the behalf of NAI Farbman, as requested by Helios AMC, LLC. For reference, Appendix 2 contains a Glossary of Frequently Used Terms.

This Phase I ESA Update was conducted in compliance with the scope and limitations of the ASTM Standard and AAI. The purpose of the ASTM Standard and AAI are to identify RECs in connection with the subject property and to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability, i.e., "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice."

2.2 DETAILED SCOPE OF SERVICES

The scope of services for this Phase I ESA Update was developed from the ASTM Standard and the additional Helios Phase I ESA requirements. This assessment included a visual inspection of the subject property and of adjoining properties, review of federal, tribal, state, and local government records and databases, interviews with persons knowledgeable of site conditions, and review of recorded environmental cleanup liens.

This report relies on the results from the Nova 2009 Phase I ESA for the limited sampling and analysis of asbestos, lead in drinking water, and radon. The scope of services for this Phase I ESA Update did not include lead-based paint sampling.

FTC&H has conducted the scope of services in accordance with the terms and conditions of Helios Professional Services Agreement Contract No. 054EA-506105611, dated March 2, 2010.

2.3 SIGNIFICANT ASSUMPTIONS

FTC&H assumes the information reviewed in this assessment (including government records and environmental databases, prior ESAs, and historical sources) is reliable and accurate. We also assume all interviewees have responded truthfully and to the extent of their knowledge.



2.4 LIMITATIONS AND EXCEPTIONS

The information gathered for this Phase I ESA Update is limited to information that is publicly available, obtainable within reasonable time and cost constraints, and is practically reviewable. It is also limited to accessible areas and conspicuous visual indicators encountered during the site reconnaissance. The ESA interpretations are made within the context of these limitations.

2.5 SPECIAL TERMS AND CONDITIONS

No special terms and conditions were required in this assessment.

2.6 USER RELIANCE

This Phase I ESA Update report is provided for NAI Farbman and Helios AMC, LLC's exclusive use. Any use of this report by others, without the written consent of FTC&H, will be without liability to FTC&H.

3.0 USER-PROVIDED RECORDS

3.1 TITLE RECORDS

During the May 2010 FTC&H Phase I ESA update, EDR was retained to conduct a complete chain of ownership report for the subject property. Ameristar Public Records Research of Southlake, Texas completed the report dated April 13, 2010. This report indicated that the first non-city or state owner of the subject property was Grandex, Inc., in September 1965. Grandex, Inc. retained ownership until April 1970, when the property was retained by Masco Corporation; Masco Corporation sold the property to St. Clair Metal Products Company in July 1976. St. Clair Metal Products Company had changed its name to Masco Tech Industrial Components, Inc. by September 1995, when the property was sold to Masco Tech, Inc., who immediately transferred the property to Masco Tech Automotive Systems Group, Inc. Two days later, Masco Tech Automotive Systems Group, Inc. sold the property to Advanced Accessory Systems, LLC. Sportrack, LLC, a Delaware Limited Liability Company (and a division of Advanced Accessory Systems, LLC) sold the property to Sport (MI) QRS 15-40, Inc. (QRS), a Delaware corporation (current owner) in November 2003. The complete Chain of Ownership Report is located in Appendix 3 of Appendix 1.

3.2 ENVIRONMENTAL LIENS OR ACTIVITY AND USE LIMITATIONS

EDR was retained to provide a review of any outstanding or recent environmental liens on the subject property. No environmental liens or activity/use limitations were found for the subject property in the EDR Environmental Lien Search Report dated December 15, 2010 (refer to Appendix 3).

In addition, Mr. Michael Kalil stated on January 19, 2011, that he had no knowledge of any environmental cleanup liens that had been filed against the subject property.

3.3 USER KNOWLEDGE

Mr. Kalil stated on January 19, 2011, that he had specialized or actual knowledge of conditions on the subject property that would be interpreted as a REC. Refer to Appendix 4 for the completed User Questionnaire.

3.4 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES

Mr. Kalil stated on January 19, 2011, that this Phase I ESA is being conducted for the court-appointed receivership of the property; therefore, the value of the subject property is not applicable to this property transaction.

3.5 PRIOR SITE INVESTIGATIONS

There have been several prior site investigations on the subject property. Helios provided FTC&H with portions of the following:

- October 30, 2002, Malcolm Pirnie, Inc. (Malcolm Pirnie) ESA Update of SportRack Automotive (Malcolm Pirnie 2002 ESA Update). This report was an update to the Phase I ESA prepared by Clayton Group Services (Clayton) on August 18, 2001, and revised on October 2, 2001 (Clayton 2001 Phase I ESA). The Malcolm Pirnie 2002 ESA Update identified the following RECs from the Clayton 2001 Phase I ESA:
 - The subject property was historically utilized as a filling area for unknown material. Some unearthed landfilling material was discovered in portion of the property during past construction activities.
 - The subject property is identified as an "open" LUST site by the MDEQ. The history of the LUST site is discussed in the August 2001 Phase I ESA prepared by Progressive Environmental Consulting & Engineering, Inc. [A copy of such was not provided.]
 - The issue of responsibility of the LUST at the subject property was addressed by the asset purchase agreement between MascoTech Automotive Systems Group, Inc., a MascoTech Accessories, Inc., and Advanced Accessory Systems, LLC. [A copy of such was not provided.] MascoTech agreed to remediate soil and groundwater affected with organic chemicals and metals related to the LUST site at the subject property. MascoTech subsequently changed its name to Metal Dyn. Metal Dyn is responsible for and conducts on-going monitoring activities at the LUST site.
 - The asphalt surface beneath and around the empty 55-gallon drums stored on the northeast corner of the property was soiled and stained. There are fissures/cracks in the asphalt in this area.
 - The area around the metal recycling containers (storage bins), northwest of the building was stained and soiled with metal scraps/shavings. The asphalt in this area has fissures/cracks.
 - The compactors west of the building have leaked hydraulic oil and therefore soiled and stained the asphalt in that area. In that area, the surface changes from asphalt to concrete, with subsequent cracks and uncovered storm drain clean-outs.
 - Three ASTs, storing alkaline cleansers, were formerly located in the southeast corner
 of the building. No sampling data for the soil beneath these ASTs was available.
 - A floor drain in the extrusion line area has been removed and the resulting hole was filled with concrete. Sampling of the soil surrounding that floor drains was not done at the time the drain was removed.



- The original office portion of the building on this property was built in 1966. Based on the apparent age, some of the materials used in the office areas are suspected ACM. Some of the suspected ACM are vinyl floor tiles, acoustical ceiling tiles and interior drywalls.
- The concrete floor beneath and around the 55-gallon drums inside the "hydraulic room" was markedly soiled and stained.
- Storm drains in the loading dock areas were covered in debris.
- Exterior storage of 55-gallon drums was not in secondary containment.
- Possible need for a storm water permit or the exterior storage of materials. There are storm drains in the fenced area where materials are stored.

The Malcolm Pirnie 2002 ESA Update identified the following additional RECs:

- Muriatic and nitric acid were stored in unregulated outdoor ASTs placed on a concrete pad without secondary containment. The nitric acid tank was made of stainless steel and contained 1,500 gallons. The muriatic acid tank was made of fiberglass and contained approximately 2.500 gallons. Acid was transferred from the tanks to the plant in aboveground stainless steel pipes that were maintained and inspected regularly due to the high cost of acid. Facility personnel estimated that the ASTs were put in service approximately in 1968. The tanks were removed in the early 1990. The ASTs were located in a fenced are on the east side of the facility. The concrete has some cracks. Soil in these areas has not been sampled. The facility dies not have any records or memory of releases from these ASTs or pipelines.
- The facility has two transformers, both of which have been classified as non-PCB by EPA regulations. Oil in the transformer that was removed in 1998 contained 93 ppm of PCBs.
- The area in which the LUST was removed shows signs of distressed vegetation.

This report concluded that "...there is less than 50% probability that soil or groundwater at the facility has been affected by a release of acids that would require corrective action in excess of the material threshold defined by the client. Although vegetation appeared stressed at the location of the former UST, Malcolm Pirnie does not recommend additional soil assessment location because the former owner is responsible for conditions associated with the former UST. The facility should file a Notice of Intent to Gain Coverage under the Multi-Sector General Storm Water Permit."

- September 13, 2003, Professional Service Industries, Inc. (PSI) Phase I ESA for SportRack Automotive (2655 16th Street and 1721 Dove Street (PSI 2003 Phase I ESA). This report identified the following RECs:
 - The subject property was listed on the EDR database report as an open LUST site. According to the EDR database report the tanks were removed in 1988. Due to the open status, a file review was conducted with MDEQ. According to the files, the tanks were removed under the supervision of the Fire Marshal in 1988 and no evidence of soil staining was observed at the time of the tank removal. However, during the tank

dismantling in 1989, corrosion and holes on the side of a toluene tank were observed and a release was reported. Soil and groundwater samples were obtained after the reported release. Groundwater samples were reported to be above regulatory limits for toluene, TCE, and VC. No soil samples had detected concentrations of contaminants above the State Residential Generic Cleanup Criteria and Screening Levels (GCCSLs), with the exception of toluene. Toluene was analyzed within the soil at 20 times the residential GCCSL for drinking water. Fourteen monitoring wells installed since 1989. The latest groundwater monitoring well data within the files (June 2000) resulted in levels of TCE, toluene and VC above the GCCSLs. A letter from CRA to the MDEQ stated that since 1997, natural attenuation has decreased concentrations of volatiles in the groundwater. However, groundwater levels continue to be above the Tier I Residential Health Based Drinking Water Risk-Based Screening Levels (RBSLs). Due to the current constituent levels, the Corrective Action selected for the site will be revised to include institutional controls. The revised Corrective Action will include a restriction from using on-site groundwater as a drinking water source. The letter also stated that a closure report will be submitted to the DEQ. Based on the known release and contamination located on the subject property, the toluene release appears to represent evidence of a REC in connection with the subject property.

- The southeast adjoining property (currently The Crown Group) was listed on the EDR Database Report as a Category S BEA (same hazardous substances). Based on the close proximity of the above facility in relation to the subject property, a file review was requested with the MDEQ. As the date of this report, the MDEQ has not responded to PSI's request. When the files are reviewed, any information inconsistent with the report will be forwarded ion an addendum. Based on the category S BEA and the assumed release at the property, it appears to represent evidence of a REC in connection with the subject property.
- 3. October 7, 2003, PSI Operations & Maintenance Plan for Asbestos-Containing Materials at the subject property and adjoining property, 1721 Dove Street. The purpose of this plan "...is to provide building occupants and maintenance personnel with general information covering potential exposure to airborne asbestos fibers and to implement procedures and practices to keep know or assumed ACM in good condition in order to minimize asbestos fiber release and exposure to building occupants." This report listed the following assumed ACM as identified in a PSI 2003 Phase I ESA: Friable ceiling tile and drywall/joint compound and non-friable floor tile/mastic, covebase/mastic, and roofing materials.
- 4. August 12, 2004, EMG Corporation Phase I ESA of Advanced Accessory Systems (EMG 2004 Phase I ESA). This report concluded that "EMG identified no RECs or historic RECs in connection with the subject property except for: 1) the LUST incident at the subject property which has not been designated "case-closed" by the MDEQ, and 2) potential impacts to the subject property from a historic release at the property adjacent to the west."
- 5. September 13, 2004, Constoga-Rovers & Associates (CRA) LUST Closure Report for SportRack Automotive (formerly MascoTech Accessories). This report details the closure activities for the two 1,200-gallon toluene USTs located near the southeast corner of the plant (Facility No. 00012081). The USTs were emptied and removed; however, no soil or groundwater onsite was actively



remediated. The site was closed as a Tier I Residential closure with deed restrictions limiting the onsite groundwater to non drinking water uses only.

- September 7, 2009, Nova Phase I ESA for Advanced Accessory Systems (Nova 2009 Phase I ESA).
 This report identified the following RECs:
 - Database St. Clair Metal Products at 1721 Dove Street is listed on the SHWS database. The SHWS database identified the Site as an inactive hazardous waste site where no actions taken to address contamination. No additional information regarding contaminants of concern or regulatory status in regards to the Part 201 Program were provided. The listing has the potential to have affected subsurface conditions at the Site as well as regulatory compliance issues; therefore, this listing represents a REC. Nova has made a FOIA request with the MDEQ to review the Part 201 files regarding the subsurface contaminant concentrations as well as compliance with the Part 201 Program. This information was not received in the time frame of this report and is considered not reasonably ascertainable. Additionally, Nova was information by Mr. Greg Barrows of the RRD that the Part 201 files could not be located with the MDEQ system.
 - Database St. Clair Metal Products at 1721 Dove Street is listed on the LUST database. The LUST database identifies the Site as having the release number C-0288-89 that was closed in 2004. Although the database indicates that the case has been closed, it does not indicate that contaminants do not still exist in the subsurface. Additionally, the MDEQ Storage Tank Information Database indicates that a Tier I Evaluation was conducted with a Deed Restriction to obtain closure under the Part 213 Program indicating that contaminant levels have exceeded MDEQ Generic Cleanup Criteria. The closure may prohibit certain future unrestricted use of the property; therefore, although this listing does not represent a regulatory compliance issue, the closure type represents a REC.
 - Database A former tenant, Sportrack Port Huron at 1721 Dove Street, is listed on the BEA database. The BEA database identified the Site as having submitted the BEA for this facility in 2004 on behalf of W.P. Carey & Company LLC. The BEA was prepared because the land was determined to contain hazardous substances at levels that would deem the Site a "facility" as defined by Part 201 of NREPA. A "facility" is any property where hazardous substances were found at levels that exceed relevant Generic residential Cleanup Criteria. The BEA was submitted as a Category D BEA, which means that difference hazardous substances intended to be utilized at the "facility" than the type of hazardous substances found to contaminate the subsurface. Nova has made a FOIA request with the MDEQ to review the RRD Part 201 files regarding the site to determine what contaminant levels exist on the property in regards to the BEA submittal. However, as stated above, the Part 201 files could not be located by RRD staff in the MDEQ system.

Additionally, the following items of environmental concern were noted and warrant mention.

■ Wells – Approximately 11 groundwater monitoring wells were observed on the southern portion of the Site, south of the building in an unsecured area outside of the fence line. These monitoring wells are associated with the former investigation of the leaking USTs...It should be determined by the MDEQ whether all or a portion of the monitoring wells are needed to comply with any future requirements associated with the investigation remedy. If not, then these monitoring wells should be abandoned by a licensed well driller to prevent any potential introduction of hazardous materials to the subsurface by vandalism or accidental release. In the interim, these wells should be monitored to ensure that the well caps are locked.

- Waste Evidence of spills, leaks, overflows, or potential routes of entry to the subsurface were observed in association with the area of concrete floor containing a mixture of water, soluble oil and non-soluble oil next to the area of drum accumulation in the northwest portion of the shop area.
- Waste There were several off-specification and/or waste drums, totes, storage tanks, and smaller containers…located within the shop area that remain in the facility after cessation of operations that should be disposed as RCRA Hazardous or Michigan Industrial wastes. The waste materials for approval and ultimate disposal. Additionally, these drums should be properly labeled and disposed in accordance with RCRA regulations in regards to length of accumulation.
- Waste Evidence of spills, leaks, overflows, or potential routes of entry to the subsurface were observed in association with the observed aboveground tanks located in the oil house northwest of the facility. The concrete containment surrounding the oil and wastewater tanks was observed to contain oil and water as well as the concrete floor outside of the containment area. Additionally, the tanks may still contain waste materials that will require proper disposal.
- Permitting The Site was listed as a National Pollutant Discharge Elimination System (NPDES) facility. This former tenant, Sportrack Automotive at 1721 Dove Street is listed on the NPDES database that identified the Site having a permit to discharge wastewater under Permit Number MIS410519 that was issued 4/1/04 and expired 4/1/09. There was no other information provided. Although this permit does not represent indication of subsurface contamination, proper closure conditions of the permit that was issued by the MDEQ has not been determined.
- Trace amounts of asbestos was identified in a vinyl floor tile on-site. Additionally, based on the age of the Site building, the building materials may contain asbestos.
- 7. October 27, 2009, Nova Phase II ESA for Advanced Accessory Systems located at 1721 Dove Street and 2655 16th Street, Port Huron, Michigan 48060 (Nova 2009 Phase II ESA). This reported summarized the soil boring and temporary monitoring well installation activities on the subject property and adjoining Former Advanced Accessory Systems site. The activities conducted on the subject property consisted of the advancement of nine soil boring/temporary monitoring wells and the sampling of six permanent monitoring wells. Soil samples were collected from all of the soil borings. All of the samples were submitted for laboratory analysis of TPH, GRO, and DRO, and five of the nine soil samples were also analyzed for SVOCs and Michigan 10 Metals. All of the groundwater samples were submitted for laboratory analysis of TPH, GRO, DRO, and VOCs, while seven of the fifteen samples were also analyzed for SVOCs and Michigan 10 metals.

The Nova 2009 Phase II ESA report concluded the following for the subject property:

Chemical analysis of the soil samples collected from test borings did not detect concentrations of metals, VOCs, or SVOCs above the RBSL. Concentrations of GRO were reported below the laboratory method detection limits (MDLs) with the single exception of one soil sample. Concentrations of DRO ranged from below MDLs to 32,000 mg/Kg in one sample. There is not a RBSL for DRO or GRO. The Chromatogram for the elevated DRO concentrations was indicative of light oil.

- Chemical analysis of the groundwater samples collected from the permanent monitoring wells and temporary wells detected concentrations of dissolved metals and vinyl chloride that exceeded the RBSLs. Chemical analysis of SVOCs indicated that the concentrations in groundwater were below their respective RBSLs.
- Concentrations of GRO were reported below MDLs with the exception of relatively low detections for groundwater samples collected at twp temporary wells. Concentrations of DRO were reported for all the groundwater samples analyzed with the exception of the temporary well. Concentrations of DRO ranged from 57 μg/L to 3,700 μg/L. The Chromatogram was again indicative of light oil for these high concentrations.
- Based on the groundwater RBSL exceedances for the dissolved metals and vinyl chloride concentrations along with the relatively high DRO concentrations observed at the site, Nova recommended providing the results of this investigation to the MDEQ to determine if additional investigation is warranted.

The Nova 2009 Phase II ESA report concluded the following for the adjacent 2655 16th Street facility:

- Chemical analysis of the soil samples collected from test borings did not detect concentrations of GRO, metals, VOCs, or SVOCs above the RBSL. Concentrations of DRO was detected above the MDL in only one sample. There is not a RBSL for DRO or GRO. The Chromatogram for the elevated DRO concentrations was indicative of light oil.
- Chemical analysis of the groundwater samples collected from the temporary wells detected concentrations of dissolved lead and vinyl chloride that exceeded the RBSLs.
- Concentrations of GRO were reported below MDLs in all three samples. Concentrations of DRO were reported for all the groundwater samples analyzed. The Chromatogram was again indicative of light oil for these high concentrations.
- Based on the groundwater RBSL exceedances for the dissolved lead and vinyl chloride concentrations along with the relatively high DRO concentrations observed at the site, Nova recommended providing the results of this investigation to the MDEQ to determine if additional investigation is warranted.

Refer to Appendix 5 of Appendix 1 for copies of these reports provided by Helios.

- May 2010 FTC&H Phase I ESA update for Former Advanced Accessory Systems 1721 Dove Street, Port Huron, Michigan (FTC&H May 2010 Phase I ESA Update). This report identified the following RECs:
 - The historical use of the subject property by various manufacturing and industrial operations for more than 45 years, and the lack of information regarding the use and storage of hazardous substances, petroleum products and hazardous wastes.
 - The presence of DRO and GRO in the site soils and groundwater indicates releases of hazardous substances or petroleum products have occurred at the subject property.

- The subject property's classification as a facility, due to the documented presence of VC and PCE in the groundwater at concentrations exceeding Part 201 GRCC.
- The material threat of a release of hazardous substances and petroleum products to soils beneath oil-stained, cracked concrete floors in several chemical storage areas.

In addition, the following items of environmental concern were noted in the Nova 2009 Phase I ESA and assessed during the FTC&H May 2010 Phase I ESA Update:

- Nova noted several off-specification and/or waste drums, totes, storage tanks, and smaller containers located in the shop area during their assessment. FTC&H confirmed the presence of these waste containers and storage tanks during this Phase I ESA update. The waste containers were staged in the northwest portion of the site building. The concrete floor in the vicinity of the waste accumulation area was observed to be stained from spills or leaks and contained several cracks. The concrete containment area and concrete floor surrounding the storage tanks was stained from leaks or spills and contained several cracks.
- Nova identified potential PCB-containing equipment during their Phase I ESA, including: a pad-mounted transformer, waste compactor, dock levelers, and light ballasts. FTC&H confirmed the presence of the potential PCB-containing equipment during this Phase I ESA update and observed that the equipment was in good shape, with no evidence of releases of hydraulic or dielectric fluids.
- During their Phase I ESA, Nova identified suspect ACMs at the subject property, including: insulation, ceiling tile, drywall assemblies, and flooring and roofing materials. Nova collected representative samples of these materials for asbestos analysis. None of the tested materials were determined to contain regulated levels of asbestos (>1% asbestos by weight). One type of vinyl floor tile was determined to contain asbestos at a concentration less than 1%. Based on the age of the building, additional ACMs may exist. FTC&H conducted a visual assessment of the suspect ACM identified by Nova. There appeared to be no significant changes in condition in the identified materials, and no additional suspect ACM was identified by FTC&H.

Based on the findings of the FTC&H May 2010 Phase I ESA Update, FTC&H recommended the following:

- A Phase II ESA should be conducted to verify the findings of the Nova Phase II ESA conducted on the subject property in October 2009.
- The hazardous and non-hazardous waste materials remaining at the subject property should be properly characterized, labeled, and disposed at appropriate waste disposal facilities in accordance with federal and state regulations.
- Confirmed and suspect ACMs should be managed-in-place in accordance with an Asbestos Operations and Maintenance Program.
- 9. May 2010, FTC&H Phase II ESA for Former Advanced Accessory Systems located at 1721 Dove Street and Port Huron, Michigan 48060 (FTC&H May 2010 Phase II ESA). This reported summarized the soil boring and temporary monitoring well installation activities on the subject property. The activities conducted on the subject property consisted of the advancement of five soil

boring/temporary monitoring wells and the sampling of five permanent monitoring wells. On soil sample was collected from each of the soil borings and one groundwater sample was collected from each of the temporary and permanent monitoring wells. All of the samples were submitted for laboratory analysis of VOCs (8260 Plus scan), PNAs, and the Michigan 10 Metals (arsenic, barium, cadmium, chromium, copper, lead, mercury, selenium, silver, and zinc). MW-D (MW-8) was only analyzed for VOCs.

The FTC&H May 2010 Phase II ESA report concluded the following for the subject property:

■ FTC&H has conducted a Phase II ESA for the subject property. The purpose of the Phase II ESA was to further evaluate the RECs identified in FTC&H's May 2010 Phase I ESA. Based on the data collected during this investigation, the subject property is a facility, as defined in Part 201 of the NREPA, P.A. 451 of 1994, as amended, due to the presence of vinyl chloride, chromium, and lead in the groundwater at concentrations exceeding their respective Part 201 GRCC.

The FTC&H May 2010 Phase II ESA report recommended the following for the subject property:

- The State of Michigan has established administrative rules and regulations for new purchasers, operators or occupants of contaminated properties designed to provide a mechanism to limit liability for pre-existing environmental contamination present on a property at time of acquisition or occupancy. In order to qualify for the liability protections, a Baseline Environmental Assessment (BEA) and a Due Care Compliance Analysis (Due Care Plan) must be completed by the new owner, operator or occupant.
- Part 201 of the NREPA, Michigan Public Act 451, 1994 as amended, defines a BEA as "an evaluation of environmental conditions which exist at a facility at the time of purchase, occupancy or foreclosure that reasonably defines the existing conditions and circumstances at the facility so that in the event of a subsequent release, there is a means of distinguishing the new release from existing contamination." There are three types of BEAs: Categories N, D, and S. Category N is applicable when the future use of the property does not include the use of hazardous substances in a significant quantity. Category D applies when the future use of the property includes the use of significant quantities of hazardous substances that are different from the contaminants that have been identified on the property. Category S applies when the hazardous substances that will be used in significant amounts are the same as the contaminants previously identified. A significant amount is greater than a typical household or office use. The BEA must be conducted within 45 days of ownership. occupancy, or foreclosure and must be submitted to the MDNRE. Based on our understanding of the proposed future site use by Helios, we anticipate a Category N BEA would be applicable for the subject property.
- Section 20107a of Part 201 of the NREPA requires that owners and operators of a facility take due care measures to ensure that existing contamination on a property does not cause unacceptable risks and is not exacerbated. These due care measures typically include a Section 7a compliance analysis and preparation of a Due Care Plan for the property.
- FTC&H recommends that a Category N Baseline Environmental Assessment and a Section 7a Compliance Analysis/Due Care Plan be conducted by Helios prior to ownership, occupancy, or foreclosure of the subject property.

3.6 REASONS FOR PERFORMING PHASE I ESA

This Phase I ESA Update was completed to satisfy due diligence requirements prior to NAI Farbman becoming the court-appointed receiver of the subject property.

4.0 SUBJECT PROPERTY DESCRIPTION

4.1 LOCATION AND LEGAL DESCRIPTION

The subject property is located in the southeast quarter of Section 16, Town 6 N, Range 17 E, City of Port Huron, St. Clair County, Michigan (see Appendix 5, Location Map and Site Plan). The property address is 1721 Dove Street, Port Huron, Michigan, 48060; and the tax identification number is 06-182-0045-000. The subject property is within an industrial area of Port Huron. A legal description is included in Appendix 3.

4.2 PHYSICAL DESCRIPTION

The subject property consists of 5.51 acres and contains a 105,773 sf, one-story, slab-on-grade, steel-framed industrial building, which was constructed in 1966. The subject property adjoins, and is accessed from, Dove Street, which is present along the south side of the subject property. Additional site improvements include paved parking drives and service areas, landscaping, and loading docks. Hydraulic dock levelers are present at the loading docks.

Utilities supplied to, but not currently active at, the subject property include: electricity (DTE Energy), potable water and sewer (City of Port Huron), and natural gas (SEMCO). The office portion of the building is heated/cooled with a combined forced natural gas/heat pump system. The shop area is heated with ceiling-mounted, natural gas unit heaters and cooled with ventilation fans. Water and sanitary sewer services have been supplied to the subject property by municipal authorities since its construction.

4.3 FACILITY OPERATIONS

The subject property is currently vacant but was previously occupied by several different automobile part manufacturers including, most recently, fabricators of metal roof rack systems. The manufacturing processes included the use and storage of several petroleum and chemical based products and wastes, of which will be discussed throughout this report.



4.4 CURRENT USES OF ADJOINING PROPERTIES

Adjoining properties were viewed from the subject property and/or public roadways. The area in the general vicinity surrounding the subject property is occupied by light industrial and warehouse facilities. Current uses of the adjoining properties include:

North: Former Advanced Accessory Systems, 2655 16th Street location.

South: Dove Street, then Earl C. Smith Distributing.

East: Former The Crown Group Port Huron (vacant) and the Pro-Weld facility.

West: DHL Global Forwarding and the Norman Jensen Warehouse facility.

5.0 ENVIRONMENTAL SETTING

5.1 TOPOGRAPHY AND SURFACE WATER

The USGS topographic map, Port Huron Michigan Quadrangle, 1991 (provided in Appendix 6) indicates the surface elevation of the subject property is approximately 605 ft amsl. The closest surface water body is the St. Clair River, which is located approximately 0.35 mile southeast of the subject property.

Based on the Nova 2009 Phase I ESA report, wetlands are not mapped on the subject property or adjoining properties on the United States Fish and Wildlife Service Wetlands Geodatabase. Formal wetlands delineation has not been conducted on the subject property.

5.2 SOILS

According to the FTC&H May 2010 Phase II ESA report, in general, the soils encountered at the subject property consisted of fine to medium grained brown sand to termination of the borings (up to 10 ft bgs).

5.3 HYDROGEOLOGY

According to the Nova 2009 Phase I ESA report:

- The subject property is situated on the northeastern portion of the Interior Plains Province directly southeast of the Michigan Basin.
- The bedrock formation beneath the subject property consists of the Mississippian-Devonian, Bedford and Antrim Shale formation. The Bedford Shale is estimated to be located between 112 to 132 ft bgl and the Antrim Shale is estimated to be located between 132 to 272 ft bgs.
- Up to 200 ft of glacial till is deposited above the bedrock surface. The glacial tills typically contain sand and a confining clay bed that overlie the bedrock layer.
- There were no water well records available for the subject property. According to a nearby Water Well
 and Pump Record obtained from the MDNRE Well Record Retrieval System (via the internet), there is
 12 ft of sand that overlies a 100-ft layer of blue clay.

According to the FTC&H May 2010 Phase II ESA report, groundwater was encountered on the subject property at depths ranging from approximately 5 to 5.8 ft bgs. If regional groundwater flow mimics surface topography, groundwater would be expected to flow to the southeast, toward the St. Clair River.

5.4 FLOOD ZONE INFORMATION

According to the Nova 2009 Phase I ESA, a review of the Flood Insurance Rate Maps published by FEMA was performed. According to Panel No. 260204 0005B, dated December 1, 1978, the subject property is located in Flood Zone C. Flood Zone C regions consist of areas of minimal flooding. The distance to the nearest 100-year floodplain is approximately 1,500 ft to the southeast.



6.0 SUBJECT PROPERTY HISTORY

The readily available historical information consisting of aerial photographs, city directories, and assessor records were reviewed to evaluate the previous uses of the subject property. Information reviewed for this project is listed in the Reference Section, and exceptions to ASTM requirements for review of historical information are described in Section 1.6 of the Nova 2009 Phase I ESA.

The subject property was undeveloped land as far back as 1938 and remained undeveloped until development of the current manufacturing facility began in 1966. The research indicates that the current facilities were constructed in phases between 1966 and 1981 as follows: According to the field sheet, the southernmost half of the southern half of the main eastern shop area (19,348 sf) and office was constructed in 1966, and the northern half of the southern half of the main eastern shop area (14,510 sf) was constructed in 1967. The northern half of the main eastern shop area (34,668 sf) was constructed in 1971. The western addition (17,160 sf) to the north half of the main eastern shop area was constructed in 1972. The far western L-shaped addition (13,201 sf) to the north half of the main eastern shop area was constructed in 1981. The structure connecting the 2655 16th Street facility and the northeastern corner of the main eastern shop area was constructed in 1990.

The following addresses were determined to have historically corresponded to the subject property: 1721 and 1723 Dove Street. The directories listed the operators of the subject property from 1968 to the present as follows:

1968 Huron Manufacturing – 1723 Dove Street

1974 St Clair Metal Products - 1721 Dove Street

1980 Huron St Clair (Division of Masco) - 1721 Dove Street

1986 St Clair Metal Products - 1721 Dove Street

1992 Huron St Clair (Division of Masco) - 1721 Dove Street

1998 Non-Published - 1721 Dove Street

2004 Sport Rack Automotive - 1721 Dove Street



7.0 SURROUNDING PROPERTIES HISTORY

The readily available historical information consisting of aerial photographs, city directories, and assessor records indicates the surrounding properties were generally vacant land as far back as 1937, until development of the warehouse and manufacturing facilities began in the late 1960s. The surrounding parcels are summarized as follows:

North: The land to the northwest has been undeveloped since 1937. The land to the northeast (2655 16th Street) was vacant land as far back as 1937, and was developed as a manufacturing facility starting in 1968. This facility has operated as an Advanced Accessory Systems 'sister' plant to the subject property.

East: The land to the east was vacant land as far back as 1937; when development of a manufacturing facility started between 1964 and 1968.

South: The land to the south and southeast was vacant land as far back as 1937, and was developed as a warehouse and distribution facility starting in 1964. Refer to Section 8 of this update for more information on the regulatory status of these sites.

West: The land to the west was vacant land as far back as 1937, and was developed as a warehouse and manufacturing facility to the southwest starting between 1964 and 1968. Construction of a larger warehouse to the northeast began between 1992 and 2000.

8.0 RECORDS REVIEW

8.1 DATABASE REVIEW/MDNRE FILE REVIEW

EDR was retained to conduct a computerized search of publicly available regulatory databases. EDR summarized the results of their review in a report, which is included in Appendix 7. Also included in their report is a map noting the locations of the listed sites.

Based on FTC&H's review of the EDR report, a FOIA request was submitted to the Southeast Michigan District offices of the MDNRE (RRD and WHMD), for the subject property, and the following sites which were considered significant to the subject property:

The results of the EDR database search and MDNRE file review are summarized in the following section.

8.1.1 FEDERAL DATABASES

<u>CERCLA/NPL</u> – Existing and proposed Superfund sites on the NPL. There were <u>no sites</u> identified within 1 mile of the subject property.

<u>CERCLIS</u> – Abandoned, uncontrolled, or inactive hazardous waste sites reported to the USEPA. There were <u>no sites</u> identified within 0.5 mile of the subject property.

<u>Delisted NPL/CERCLIS NFRAP</u> – Delisted sites on the NPL or CERCLIS NFRAP list. There were <u>no sites</u> identified within 0.5 mile of the subject property.

<u>RCRA CORRACTS</u> – Reported sites that generate, treat, store, and/or dispose hazardous waste and are subject to federal RCRA regulations with corrective action activity. There was <u>one site</u> identified within 1 mile of the subject property.

 Prestolite Wire Corp of Port Huron, located at 3519 24th Street (approximately 0.75 mile SSW of the subject property. This site is not considered significant to the subject property because of its distance and hydrogeological position (sidegradient) from the subject property.

<u>RCRA Non-CORRACTS TSD</u> – Reported sites that treat, store, and/or dispose hazardous waste and are subject to federal RCRA. There were <u>no sites</u> identified within 0.5 mile of the subject property.

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RCRA Generators – Reported sites that generate hazardous waste and are subject to federal RCRA regulations. The subject property was listed as a CESQG under Sportrack Automotive, with no violations identified on the database; the MDNRE did not have any files pertaining to the generator status of the site.

The following two SQG sites and four CESQG sites were identified within the search radii of the subject property:

- Michigan Metal Coatings Co., located at 2015 Dove Street (approximately 0.18 mile west of the subject property). The database indicated that the site has received notices of violations; however, the most recent available information from the MDNRE was a November 19, 2009, letter from the MDNRE to the site indicating that, based on information provided, the site had corrected any violations identified. Therefore, this site is not considered significant to the subject property.
- SBR Printing USA, located at 1906 Dove Street (approximately 0.11 mile west of the subject property). This site has also received notices of violations; however, the most recent available information from the MDNRE was a December 21, 2009, letter from the MDNRE to the site indicating that, based on information provided, the site had corrected any violations identified. Therefore, this site is not considered significant to the subject property.
- Smith Earl Distributing Co., located at 1730 Dove Street (southern adjoining property). This site did
 had no reported violations and is, therefore, not considered significant to the subject property.
- Pro Weld Inc., located at 1720 Dove Street (adjoining ENE property). This site had no violations identified. The only information available on this site was related to an August 30, 2004, complaint from a former employee who stated that the site directly dumps wastewater and sludge in the storm drains onsite. Internal MDNRE e-mails stated that an independent water department inspection discovered no evidence of storm water sewer discharges, and the company reported to be discharging to a sanitary sewer. Therefore, this site is not considered significant to the subject property.
- Penske Truck Leasing Co LP, located at 1900 Dove Street (approximately 0.1 mile SW of the subject property). This site had no violations identified, and the most recent available information from the MDNRE was a May 2, 2008, Facility Inspection Report that stated the facility is certified after an inspection of a 10,000-gallon diesel AST. Therefore, this site is not considered significant to the subject property.

 UPS Port Huron Center, located at 1616 Cleveland Avenue (approximately 0.18 mile SSE of the subject property). This site had no violations identified and is therefore, not considered significant to the subject property.

<u>ERNS</u> – Sites that have reported releases or spills of CERCLA hazardous substances in quantities greater than the reportable quantity. The subject property was <u>not listed</u>.

<u>USEC/IC List</u> - Sites that have USEC/IC in place. The subject property was not listed.

<u>U.S. Brownfields List</u> – Brownfield properties addressed by Cooperative Agreement Recipients and Targeted Brownfields Assessments. There were <u>no sites</u> identified within 0.5 mile of the subject property.

8.1.2 STATE AND TRIBAL DATABASES

<u>SHWS</u> – The *Contaminated Sites in Michigan List (Part 201 sites)* was checked for known sites of contamination within 1 mile of the subject property. The subject property <u>was identified as a SHWS</u> site.

Very limited information was available for review from the MDNRE on this listing for this site. From what was identified, the source of contamination on the site was credited to miscellaneous metal work with no actions taken to address contamination. The only information available at the MDNRE on the site consisted of one page of notes from August 13, 1996, written by the MDNRE project manager, who indicated that the consultant for a LUST investigation (discussed below) needed to choose if the site was going to be closed under Part 201 or Part 213 (LUST). However, the September 10, 2004, Closure Report for the LUST investigation indicated that the elevated levels of VC and PCE in the groundwater onsite could not be attributed to the toluene release and "...are to be addressed separately, under Act 451, Part 201." There was no information available regarding the VC and PCE investigation. According to the results of the groundwater sampling during the Nova October 2009 Phase II ESA, PCE was not detected above the applicable Part 201 GRCC in any of the 15 groundwater samples collected throughout the site. VC was detected above the applicable Part 201 GRCC, but only in the groundwater samples collected from the monitoring wells associated with the former LUST investigation along the southern portion of the site (refer to further information provided below).

Three other sites were identified within 1 mile of the subject property, Prestolite Wire Corp. (identified above); Gibraltar Sprocket Co., located at 3952 Military Street (approximately 0.85 mile SSW of the subject property); and Anchor Recycling, located at 2829 Goulden Streen (approximately 0.95 mile SW of the subject property). These sites are not considered significant to the subject property because of their distance and hydrogeological (sidegradient) position.

LUST – The MDNRE Leaking UST Sites List was reviewed for known sites of contamination. The subject property is a closed LUST site. A portion of the September 10, 2009, Closure Report for this LUST was provided by Helios for the May 2010 Phase I ESA Update; the figures for the report and other available information, primarily prior investigative reports, were reviewed at the MDNRE office. The available information indicated that a release was reported to the state in May 1989, after the two 1,200-gallon toluene/paint mask wash USTs were removed from the ground and inspected, but prior to their disposal. The inspection revealed small corrosion holes in the tanks. The soil investigations on the site revealed elevated levels of chromium only, while the groundwater investigations revealed elevated levels of VC, PCE, and several dissolved metals. The VC and PCE were considered to be attributed to a source other than the toluene USTs; therefore, they were not addressed, while the dissolved metals originally detected naturally degraded over time. The closure strategy included restricting the site's groundwater use to only non-drinking water uses. Based on the available figures from the Closure Report, the extent of groundwater impact based on June 1994 and November 1996 groundwater analytical results, is limited to the entire southern portion and southeastern corner of the site; the most recent (June 2004) calculated direction of groundwater flow on the site is to the south-southeast.

FTC&H conducted Phase II ESA activities on the subject property in May 2010 (as detailed in Section 3.5). These activities determined that the groundwater on the subject property is contaminated with vinyl chloride, chromium, and lead above Part 201 GRCC; therefore, the SHWS and LUST listings for the subject property are considered significant.

The following six sites were identified within 0.5 mile of the subject property:

- Earl Smith Distributing Co. (identified above). This site reported two unknown substance releases in May 1991, one of which was closed on an unknown date and the other was closed in November 1991. The site also reported one unknown substance release in June 1991, which was also closed in November 1991. There were no files available to review at the MDNRE for this site; however, the site is not considered significant to the subject property based on the regulatory closure of the release.
- Earl C. Smith, Inc., located at 1720 Dove Street (southern adjoining property). This site reported an unknown substance release in October 1991, which was closed in November 1995. The Closure Report for this release was reviewed at the MDNRE. The remedial activities included the removal and proper disposal of 1,500 cubic yards of soil, and the most recent groundwater analytical data indicated that no parameters were detected above the RBSLs. Therefore, the site was closed as a Tier I, unrestricted residential closure and is, therefore, not considered significant to the subject property.

- Coca-Cola Bottling Co. of Michigan located at 1608 Dove Street (approximately 0.08 mile ESE of the subject property). This site reported an unknown substance release in February 1990, which was closed in May 1998. The closure report for this release was reviewed at the MDNRE. This report indicated that the soil and groundwater analytical data were such that the site was closed as a Tier I, unrestricted residential closure and is, therefore, not considered significant to the subject property.
- Penske Truck Leasing Co., LP (identified above). This site reported a diesel release in July 1993, which was closed in April 1995. The Closure Report for this release was reviewed at the MDNRE. This report indicated that the soil and groundwater analytical data were such that the site was closed as a Tier I, unrestricted residential closure and is, therefore, not considered significant to the subject property.
- Blue Water Area Trans. Commission, located at 2021 Cleveland Avenue (approximately 0.2 mile SW of the subject property). This site reported a diesel release in August 2009; the MDNRE did not have any files available to review for this site. However, this site is not considered significant to the subject property because of its hydrogeological (sidegradient) position.
- Sterling Construction, located at 3201 Military street (approximately 0.42 mile south of the subject property). This site reported an unknown substance release in December 2000 that remains open.
 However, this site is not considered significant to the subject property because of its distance and hydrogeological (downgradient) position.

<u>UST</u> – The *Michigan Underground Storage Tank Facility and Tank Data Listing* was reviewed for the presence of registered USTs at the subject property and adjacent properties. The subject property was listed as historically having had five USTs onsite. The two 1,200-gallon toluene USTs, identified above, were installed in 1975 and removed in November 1988. A 16,000-gallon diesel and water UST was installed in March 1978 and was removed in September 1984. A 1,000-gallon "hazardous substance" UST was installed in March 1984 and removed in November 1988. A 1,100-gallon water UST was installed in March 1985 and removed in March 1986.

The following five sites were identified adjoining (or within 0.1 mile of) the subject property:

- Earl Smith Distributing Co. (identified above). This site had two 2,000-gallon gasoline and one 2,000-gallon diesel UST installed in April 1980 and removed in October 1990.
- Earl C, Smith Inc. (identified above). This site had one 5,000-gallon diesel and one 6,000-gallon gasoline UST installed in April 1964. Additionally, there were one 250-gallon used oil UST and one

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5,000-gallon diesel UST installed on an unknown date. All of these tanks were removed in October 1991.

- Riverside Metal Products Co., located at 1631 Dove Street (approximately 0.06 mile east of the subject property). This site had one 1,200-gallon UST with unknown contents and one 1,200-gallon "hazardous substance (bulk paint MEK mask wash)" UST installed in March 1976 and removed in August 1990.
- Coca-Cola Bottling Co of MI (identified above). This site had one 2,000-gallon gasoline and one 10,000-gallon diesel UST installed in April 1971 and removed in June 1991.
- Penske Truck Leasing Co. LP (identified above). This site had one 1,000-gallon used oil UST installed in February 1977 and one 12,000-gallon diesel UST installed in February 1980, both of which were removed in July 1993.

<u>SWF/LF</u> – The MDNRE Reports of Active Solid Waste Facilities and Transfer Stations and the MDNRE Report of Inactive Solid Waste Facilities were checked for known disposal sites. There were <u>no sites</u> identified within 0.5 mile of the subject property.

<u>State Brownfield Sites</u> – State-funded Part 201 and Part 213 sites that have been redeveloped using the BEA process. There were <u>no sites</u> identified within 0.5 mile of the subject property.

<u>BEA Sites</u> – State of Michigan BEA sites. The subject property was listed as having had a Category D BEA (No. 2243) submitted by W.P. Carey & Company, LLC on January 5, 2004. The MDNRE was unable to locate this BEA to allow for review, and no copy was provided by the User of this Phase I ESA Update. There were <u>no listings</u> for the adjoining properties.

Other – The subject property was also identified on the NPDES database, which indicated that Advanced Accessory Systems received a COC permit in July 2009. Facilities that are determined to be eligible to be covered under a general industrial storm water permit in the NPDES receive a COC. A general permit is designed to cover permittees with similar operations and/or type of discharge. General permits contain effluent limitations protective of most surface water statewide. This listing is considered significant to the subject property.

Orphan Sites – Those sites that could not be mapped by EDR due to poor or inadequate address information. All of the sites identified were further researched in the applicable database and their locations compared to the subject property. All of the sites identified are located at a distance from the subject property where they are unlikely to impact the subject property.

8.2 LOCAL GOVERNMENTAL AGENCY REVIEW

8.2.1 HEALTH DEPARTMENT

On April 9, 2010, the St. Clair County Health Department (SCCHD) was contacted by FOIA request for information on the subject property, particularly related to environmentally related incidents (chemical spills or releases) in the areas of air quality, surface water, groundwater, hazardous, and solid waste that have occurred at the site. A telephone response was via voicemail indicating that no files existed for the subject property. On December 29, 2010, the SCCHD was again contacted by FOIA request for new or additional information on the subject property since April 2010. On January 3, 2010, a telephone response was received indicating that no files existed for the subject property.

8.2.2 FIRE DEPARTMENT

On April 7, 2010, the City of Port Huron Fire Department was contacted via FOIA request, through the City Clerk's office, regarding the available information on the subject property. On April 9, 2010, the available information was reviewed at the City Clerk's office. The available information included a "Pre-Fire and Hazardous Substances" sheet and a "Storage Tank Inventory Inquiry" sheet printed from the Fire Department electronic database. The Pre-Fire and Hazardous Substances sheet information indicated that the last pre-fire survey on the subject property was in August 2001. This sheet also identified the following hazardous materials:

| DATE | MATERIAL | QUANTITY | LOCATION |
|------------|-------------|-----------------------|-------------------------|
| 07/18/1988 | MEK | 5 gallons | NW corner of factory |
| 07/18/1988 | Toluene | 3-4 gallons | NW corner of factory |
| 06/04/1992 | Ethanol | 3 55-gallon drums | NW corner of factory |
| 06/04/1992 | Waste Water | 2 15,000-gallon ASTs | E side exterior |
| 06/04/1992 | Propane | 16 40-pound tanks | N side exterior & lifts |
| 06/04/1992 | Waste Oil | 2 2000,-gallon tanks | NW corner, exterior |
| 06/04/1992 | Acetylene | 4 200-pound cylinders | NW corner, interior |
| 06/04/1992 | Argon | 8 tanks | NW corner, interior |
| 01/25/1994 | Ethanol | 1 55-gallon drum | NW corner of factory |
| 01/25/1994 | Isopropanol | 1 55-gallon drum | NW corner of factory |
| 01/27/1994 | Esopropanol | 1 55-gallon drum | NW corner of factory |

The Storage Tank Inventory Inquiry sheet provided the following tank information for the subject property:

| PRODUCT | TANK SPECS. | DATE INSTALLED | DATE REMOVED |
|-------------|-------------------------|----------------|--------------|
| Toluene | 6,000-gal below ground | 06/22/1972 | 11/23/1988 |
| Gasoline | 4,000-gal below ground | 06/22/1972 | 11/23/1988 |
| Waste Oil | 1,000-gal below ground | 06/22/1972 | 11/23/1988 |
| Toluene | 1,200-gal below ground | 01/01/1975 | 11/23/1988 |
| Toluene | 1,200-gal below ground | 01/01/1975 | 11/23/1988 |
| Diesel | 16,000-gal below ground | 01/01/1978 | 11/23/1988 |
| Waste Water | 1,100-gal above ground | 01/01/1985 | 12/01/1992 |

On December 28, 2010, the Fire Department was again contacted via FOIA request for any information on the subject property since April 2010. On January 3, 2011, a telephone response was received indicating that the most recent files for the subject property are from 2008 as the property has been vacant since then.

8.2.3 DEPARTMENT OF PUBLIC WORKS

On May 12, 2010, the City of Port Huron Department of Public Works – Utilities Division was contacted regarding the municipal water supply's compliance with federal and state water quality standards, including lead. Mr. Eric C. Witter, P.E., the Utilities Manager, responded via e-mail the same day and indicated that the City's water supply "meets all applicable federal and state drinking water standards." On January 4, 2011, Mr. Witter was contacted again for an updated status of the City's water supply. On January 5, 2011, Mr. Witter responded via e-mail that the City's water supply continues to meets all applicable federal and state drinking water standards."

8.2.4 OTHER - ASSESSING DEPARTMENT, BUILDING DEPARTMENT

The available Assessing and Building Department files for the subject property were reviewed online on April 7, 2010, and at the City's Building Department on April 9, 2010. There was no information available that had not been included in the Nova 2009 Phase I ESA. The most recent assessing information available provided the owner information (Sport QRS 15-40, Inc.), general tax, land, and building information, as well as identified one sales records from November 2003 when the property was sold to QRS from Sportrack, LLC.

The available information from the Building Department included a notification of "MEK use for coating area" in June 1987; a building permit application for: a "cement foundation and platform with retention drain and holding tank for holding a scrap gondola for press oil" in June 1989 and; the February 2004 "Notice of Local Units of Government of Land Use Restrictions and Restrictive Covenant" for the



2004 LUST closure on the subject property. This notice indicated that a drinking water well may not be installed or utilized within the land in the southeast corner of the subject property.

On January 4, 2011, the available Assessing Department files online for the subject property were reviewed again and all of the information stated above remains the same. On January 5, 2011, the Port Huron Planning Department was contacted regarding any information of the subject property since April 2010. According to Ms. Betty Child, there have been no permits or complaints filled for the property nor any inspections conducted.

9.0 SITE RECONNAISSANCE

Ms. Looney conducted a site reconnaissance of the subject property on January 3, 2011. FTC&H was accompanied through the subject property by the security company that typically conducts twice daily site walk-throughs. The site reconnaissance included an inspection of interior and exterior building areas and the outside areas of the subject property. Adjacent properties were viewed from the subject property. Photographs taken and the form completed during the reconnaissance are included in Appendix 8. The site reconnaissance was limited by paved areas. Following is a summary of observations made during the site reconnaissance.

9.1 FACILITY OBSERVATIONS

9.1.1 GENERAL SITE SETTING

The subject property consists of 5.51 acres and contains a 105,773 sf, one-story, slab-on-grade, steel framed industrial building, constructed in 1966. Additional site improvements include paved parking, drives, and service areas, landscaping, and loading docks. Refer to the Site Plan in the Nova 2009 Phase I ESA for a detailed layout of the subject building.

9.1.2 POTABLE WATER

The subject property is supplied potable water by the City of Port Huron and has been since its construction.

9.1.3 WASTEWATER/STORM WATER

All sanitary wastewater from the subject property is conveyed to the City of Port Huron sanitary sewer system.

The subject property is currently vacant, and therefore does not produce any process related wastewater. When the facility was operating, it had a NPDES permit associated with the former wastewater treatment system onsite, the details of which are unknown.

Storm water from the subject property is directed toward the onsite catch basins connected to the municipal storm sewer system; this water is treated prior to discharge to the St. Clair River.

9.1.4 DRAINS OR SUMPS

In addition to the observations made in the Nova 2009 Phase I ESA, a trench drain system was observed inside the eastern portion of the northeast shop area (refer to the Site Plan in the Nova 2009 Phase I ESA). These trenches contained several inches of oil and were most likely a collection system for hydraulic oil coming off the presses used in the manufacturing process. The trench drains drained to a large sump that pumped the fluids through overhead piping to the hydraulic fluid AST located in the approximate center of the building. The integrity of this system is unknown and significant oil staining was observed throughout the concrete area around the oil collection system.

9.1.5 STAINS, CORROSION, OR ODORS

In addition to the evidence of spills, leaks, and overflows described in Section 4.5 of the Nova 2009 Phase I ESA, significant oil staining was observed throughout the concrete area around the oil collection system, as described above.

9.1.6 HEATING AND COOLING

The office portion of the subject building is heated and cooled with a forced air natural gas/heat pump system; the manufacturing/shop portions are heated with ceiling-mounted, natural gas unit heaters and cooled with ventilation fans.

9.1.7 SOLID WASTE/FILL MATERIAL

Solid waste materials, including demolition debris and office wastes, were observed in a dumpster located near the northwest service area. No significant fill material was observed on the subject property.

9.1.8 PITS/PONDS/LAGOONS

No pits, ponds, or lagoons were observed on the subject property or adjoining properties.

9.1.9 STAINED SOIL OR PAVEMENT

No stained soils were observed on the subject property and only minimal stained pavement was observed on the asphalt drive and parking areas.

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9.1.10 STORAGE TANKS

The storage tanks listed and described in Sections 4.5 and 4.8 of the Nova 2009 Phase I ESA were confirmed by FTC&H. In addition, two approximately 500-gallon waste hydraulic fluid ASTs (described above) were observed in the approximate center of the shop area. One of these tanks was observed on a secondary containment structure, while the other was apparently empty and situated on the ground to the north of the other tank. Evidence of spills and leaks of fluids was observed around these tanks in addition, the concrete floors in the vicinity appeared to be in poor condition, with evidence of cracks.

9.1.11 HAZARDOUS SUBSTANCES OR PETROLEUM PRODUCTS

The hazardous substances and petroleum products observed on the subject property by Nova included:

Oil Shed: Four 55-Gallon drums of hydraulic fluid and oils

Northwest Shop Area:

Two 500-gallon totes of hydraulic fluid and coolant oils

Approximately twenty-five 55-gallon drums of hydraulic fluid and oils

Six 55-gallon drums of an unknown dry powder

One 55-gallon drum of unknown grease

One 55-gallon drum of unknown material

Two pallets of unknown materials in 1- and 5-gallon containers

FTC&H observed these waste containers and drums during the site reconnaissance. The concrete floor in the vicinity of the waste containers and drums was stained indicating the potential for spills and leaks from these containers. The concrete floor contained cracks in the area of staining.

9.1.12 HAZARDOUS OR NON-HAZARDOUS WASTE

The hydraulic fluid, oils and greases would be considered non-hazardous waste. It is not known if any of the unknown materials would be classified as hazardous waste.

9.1.13 ENVIRONMENTAL PERMITS

There are no current environmental permits for the subject property. When the subject property was historically occupied, it had five UST permits, a NPDES permit associated with the former wastewater treatment system, and was a RCRA CESQG based on the amount of hazardous waste generated in a month.

9.1.14 HYDRAULIC OR ELECTRICAL EQUIPMENT (PCBs)

One large pad-mounted, site owned transformer was observed in the southeast portion of the subject property. This transformer was not labeled non-PCB containing. In addition, the hydraulic levelers in the loading dock area, the trash compactor, and light ballasts throughout the subject property have the potential to contain PCBs. However, all of these appeared to be in good condition with no evidence of leaks or spills

9.1.15 SENSITIVE RECEPTORS/WETLANDS

No low-lying (wetland) areas were observed on the subject property.

9.1.16 OTHER

Eleven groundwater monitoring wells from the former LUST investigation activities were observed in the southern portion of the subject property. Some of these wells were observed to be flush with the ground while others were stick ups. These wells were located outside of the fenced in area but did not appear to have been tampered with.

10.0 ADDITIONAL SERVICES

The following non-ASTM Standard additional services were requested to be completed on the subject property by Helios.

10.1 ASBESTOS-CONTAINING BUILDING MATERIALS

During their 2009 Phase I ESA, Nova identified suspect ACMs at the subject property, including: insulation, ceiling tile, drywall assemblies, and flooring and roofing materials. Nova collected representative samples of these materials for asbestos analysis. None of the tested materials were determined to contain regulated levels of asbestos (>1% asbestos by weight). One type of vinyl floor tile was determined to contain asbestos at a concentration less than 1%. Other suspect ACMs observed at the subject property included roofing materials. Based on the age of the building, additional ACMs may exist. FTC&H conducted a visual assessment of the suspect ACM identified by Nova. These materials appeared to have degraded slightly since April 2010 due to the lack of maintenance to the building. However, no additional suspect ACM was identified by FTC&H.

10.2 LEAD-BASED PAINT

As stated in Section 4.10 of the Nova 2009 Phase I ESA, lead-based paint may be present in the subject building; however, the current regulations regarding lead-based paint are generally for residential properties. The subject building is not used for residential purposes; however, all painted surfaces were observed to be in fair to poor condition with significant signs of peeling and flaking paint in several locations.

10.3 LEAD IN DRINKING WATER

Nova sampled three water sources in the subject building for lead content during the September 2009 Phase I ESA; the results of which were either non-detect at the laboratory MDLs, or below the USEPA action level for lead in drinking water. FTC&H concluded that additional sampling was not necessary as a part of this investigation. Refer to Section 4.11 of the Nova 2009 Phase I ESA for more information (included in Appendix 1).

10.4 RADON

Nova conducted two tests for the presence of radon in the subject building. The results were below the USEPA action level for radon. FTC&H concluded that additional tests were not necessary as a part of this investigation Refer to Section 4.12 of the Nova 2009 Phase I ESA for more information (included in Appendix 1).

10.5 MOLD

FTC&H did observe evidence of significant water infiltration into the subject building; however, no visible mold growth was observed during the site reconnaissance. The observations described in Section 4.13 of the Nova 2009 Phase I ESA were confirmed by FTC&H.

10.6 ELECTROMAGNETIC (EM) FIELD

FTC&H did not observe any high voltage electrical lines on, or adjacent to, the subject property. The observations described in Section 4.14 of the Nova 2009 Phase I ESA were confirmed by FTC&H.

10.7 UREA FORMALDEHYDE

Urea foam insulation was not observed at the subject property during the FTC&H site reconnaissance. The observations described in Section 4.15 of the Nova 2009 Phase I ESA were confirmed by FTC&H.

10.8 DRY CLEANERS/LAUNDRY FACILITIES

FTC&H did not observe any dry cleaners or laundry facilities on the subject property during the site reconnaissance. The observations described in Section 4.16 of the Nova 2009 Phase I ESA were confirmed by FTC&H.

11.0 INTERVIEWS

11.1 INTERVIEW WITH OWNER

An interview was conducted via telephone on April 29, 2010, with Mr. Brooks Gordon, who represented the current subject property owner, real estate investment company QRS. Mr. Gordon is considered the key site manager. He was interviewed regarding the environmental conditions associated with the subject property. Mr. Gordon has been familiar with the subject property since QRS acquired it in 2003.

According to Mr. Gordon, the subject property is currently a vacant manufacturing/industrial building. It was formerly an automotive parts manufacturing facility. Mr. Gordon is not familiar with any specific site features, nor surrounding properties. He was unaware of the property's former wastewater systems and of the current or former hazardous substance/petroleum product use and storage on the property. Mr. Gordon explained that the only role he has had with the property since the date of acquisition has been as an absentee owner. The only history he knows of the subject property is what he has read in third-party consultant reports. Mr. Gordon provided Helios with all environmental reports, documentation, correspondence, etc. that he has on the subject property. A copy of the interview questions and answers is located in Appendix 10 of Appendix 1.

11.2 INTERVIEW WITH SITE/PROPERTY MANAGER

An interview was conducted during the site reconnaissance on January 3, 2011, with Mr. John McMann of the security company that conducts surveillance at the subject property twice a day, every day. According to Mr. McMann, he has been the security guard for the subject property since the summer of 2008. Mr. McMann was interviewed regarding the environmental conditions associated with the subject property as the daily site manager.

According to Mr. McMann, the subject property is generally unchanged since April 2010. There have not been any illegal dumping, burying, or burning incidents on the subject property and the same hazardous materials and petroleum products that were onsite in April, remain onsite today. Mr. McMann stated that the condition of the subject property has continued to deteriorate with time and little to no maintenance. The roof leaks, which causes more and more paint to peel off of the metal ceilings and more and more water to pool in the floor in areas inside. Mr. McMann explained that there has been one break-in to the adjoining 16th Street former Advanced Accessory Systems building during which an individual began to remove the copper conduit from the ceiling in the main shop area until disrupted by Mr. McMann and the police were called. Mr. McMann did not have any additional information on the subject property.



11.3 INTERVIEWS WITH OCCUPANTS

The subject property is unoccupied.

11.4 INTERVIEWS WITH OTHERS

No other individuals were identified for an interview regarding the subject property.

12.0 FINDINGS

The subject property is situated on approximately 5.51 acres and contains a 105,773 sf industrial building that has been occupied by various manufacturing/industrial businesses since 1965.

There have been several previous environmental assessments and investigations on the subject property. These assessments have identified RECs, including that two former toluene USTs which historically leaked some of their contents into the subsurface onsite; that contaminants such as PCE and VC are present above the applicable cleanup criteria in the subject property groundwater; oil stained concrete and asphalt exists inside and outside the subject building and; the existence and also at times, improper storage of hazardous substances and petroleum products.

The Nova 2009 Phase I ESA also identified the following additional, non-ASTM Phase I ESA scope, environmental concerns associated with the subject property: the 11 groundwater monitoring wells that remain onsite are not in a secure location and are subject to vandalism; evidence of spills, leaks, and overflows around the drum accumulation area in the northwest shop area and around the 2,500-gallon waste oil/water ASTs outside; the off-specification waste drums, totes, and storage tanks that remain onsite; the lack of information regarding the facility's NPDES permit; and the trace amount of asbestos identified in a vinyl floor tile within the building.

The most recent soil and groundwater analytical results collected for the FTC&H May 2010 Phase II ESA, indicated that the subject property is a *facility*, as defined in Part 201 of the NREPA, P.A. 451 of 1994, as amended, due to the presence of vinyl chloride, chromium, and lead in the groundwater at concentrations exceeding their respective Part 201 GRCC.

The subject property was identified on the LUST, SHWS, NPDES, RCRA Generators, and BEA regulatory databases. The LUST listing is associated with the two toluene USTs identified above. This investigation was closed in 2004 through a deed restriction on the site's groundwater use. The SHWS listing is associated with the elevated levels of VC and PCE detected in the site groundwater during the toluene LUST investigation. No actions have been taken to address this contamination. The NPDES listing is a permit related to the former wastewater treatment plant onsite which discharged to the municipal sanitary sewer system. The RCRA generator listing is associated with the site's former generation of hazardous wastes at a CESQG status. No waste violations were identified in the regulatory database search performed by EDR. The BEA listing is related to a former occupant's submittal of a Category D BEA.

During the site reconnaissance, a trench drain system that contained several inches of oil was observed in the northeast section of the shop portion of the subject building. This trench system was most likely constructed to collect leaking hydraulic fluid from presses used in the manufacturing process. The oils



drained to a sump that pumped collected oil through overhead piping to an AST located in the approximate center of the subject building. Significant oil staining was observed on the concrete floors surrounding the trench drain system and the AST. The concrete floor in the vicinity of the AST appeared to be in poor condition, while the integrity of the trench drain system could not be determined.

During the site reconnaissance, a below ground waste oil pump tank was observed along with several 55-gallon drums, smaller totes, buckets, and miscellaneous containers of hazardous substances and petroleum products in the northwest corner of the subject building. The waste oil pump tank served as an interior collection point for waste oil and water that was connected via overhead piping to the two approximate 2,500-gallon waste oil ASTs within the exterior oil house. The hazardous substances and petroleum products were a part of the manufacturing processes onsite. The ASTs were part of the onsite wastewater treatment system described above. Significant pools of oil and concrete staining from leaks and/or spills was observed in the waste oil pump tank area, surrounding the miscellaneous containers, and within the AST secondary containment structure in exterior oil house. The integrity of the waste oil pump tank could not be determined, as it was covered with oil and water.

Also during the site reconnaissance, Eleven groundwater monitoring wells from the former LUST investigation activities were observed in the southern portion of the subject property. Some of these wells were observed to be flush with the ground while others were stick ups. These wells were located outside of the fenced area but did not appear to have been tampered with.

The subject property is surrounded by industrial properties that were developed during the same time frame. Manufacturing and industrial facilities, in general, use and store hazardous substances and petroleum products as well as generate hazardous wastes. Several of the adjoining and immediately surrounding sites were identified as RCRA generators and/or were listed on the LUST and UST databases. The RCRA generator sites either did not have any regulatory violations reported, or provided the appropriate documentation to correct them. All but one of the LUST investigations has been closed; the one open release is located at a hydrogeological sidegradient position, more than 0.2 mile from the subject property. All of the identified UST sites have had all of their USTs removed from the ground.



13.0 DATA GAP ANALYSIS

FTC&H was unable to interview any prior occupants of the subject property during the course of this investigation. It is unlikely the occupants would have any additional knowledge of the subject property that was not determined through the historical research, regulatory file review, and site reconnaissance conducted as a part of this Phase I ESA. Therefore, this data failure is not considered a significant data gap.

The lack of information regarding the complete use and historical storage of hazardous materials and petroleum products on the subject property is a significant data gap.

A response to the December 29, 2010, FOIA request to the MDNRE to review the available information on the subject property and the Blue Water Area Trans Commission property located at 2021 Cleveland Avenue, was not received by the issuance of this report. The available SHWS, LUST, and UST files for the subject property were reviewed in April 2010; the property use has remained unchanged since that time; therefore, this data failure is not considered a significant data gap. No files related to the NPDES permit onsite were available for review. This data gap is not considered significant because the Nova 2009 and the FTC&H May 2010 Phase II ESA activities assessed the soil and groundwater conditions on the subject property; therefore, any potential impact from noncompliances associated with this permit was also assessed.

The MDNRE had no files available to review in April 2010 for the Blue Water Area Trans. Commission property; however, the property is located sidegradient of the subject property and not considered significant to the subject property; therefore this data failure is not considered a significant data gap.



14.0 OPINIONS

The historical use of the subject property by various manufacturing and industrial operations for more than 45 years, and the lack of information regarding the use and storage of hazardous substances, petroleum products, and hazardous waste has been investigated through the Nova 2009 and FTC&H May 2010 Phase II ESA soil and groundwater sampling activities conducted on the subject property and is therefore, not considered a REC.

The subject property is listed on the SHWS database due to the elevated levels of VC and PCE detected in the site groundwater during the toluene LUST investigation. No actions have been taken to address this contamination. The subject property's classification as a *facility*, due to the documented presence of VC and PCE from this listing and from chromium and lead detected during the FTC&H May 2010 Phase II ESA activities, at concentrations exceeding Part 201 GRCC, is considered a REC.

The subject property is listed on the LUST database with a closed status. The site achieved regulatory closure in 2004 through a deed restriction on the site's groundwater use and, therefore, does not represent a REC to the subject property.

The RCRA generator listing for the subject property is associated with the site's former generation of hazardous wastes at a CESQG status. There were no waste violations identified in the regulatory database search performed by EDR. The listing of the subject property as a RCRA-CESQG, without evidence of a release of hazardous wastes, is not a REC.

Significant oil-staining and pooled oil was observed on concrete floors in the vicinity of several hazardous substance and petroleum product use and storage areas on the subject property, including: the hydraulic oil trench drain system; the waste hydraulic fluid ASTs; the waste oil pump tank area; the chemical container storage area; and the waste oil ASTs within the exterior oil house. The concrete floor throughout the building was observed to have cracks, which represent a possible migration pathway to soils beneath the building. These areas were investigated during the FTC&H May 2010 Phase II ESA activities; however, the material threat of a release of hazardous substances and petroleum from these containers remains, and is considered a REC.

None of the sites of known or potential contamination identified in the regulatory database search were determined to have the potential to cause environmental impact to the subject property and are, therefore, not considered to be a REC.

15.0 CONCLUSIONS

FTC&H has performed a Phase I ESA Update in conformance with the scope and limitations of the ASTM Standard and AAI at the Former Advanced Accessory Systems site located at 1721 Dove Street, Port Huron, Michigan, the subject property. Any exceptions to, or deletions from, this practice are described in the Limitations and Exceptions section of this report. This assessment has revealed no evidence of RECs in connection with the subject property, except the following:

- A. The subject property's classification as a *facility*, due to the documented presence of vinyl chloride, chromium, and lead in the groundwater at concentrations exceeding Part 201 GRCC.
- B. The material threat of a release of hazardous substances and petroleum products to soils beneath oil-stained, cracked concrete floors in several chemical storage areas.

In addition, the following items of environmental concern were noted in the 2009 Nova Phase I ESA and assessed during the FTC&H Phase I ESA Updates (May 2010 and current):

- Nova noted several off-specification and/or waste drums, totes, storage tanks, and smaller containers located in the shop area during their assessment. FTC&H confirmed the presence of these waste containers and storage tanks during the May 2010 Phase I ESA Update. The waste containers were staged in the northwest portion of the site building. The concrete floor in the vicinity of the waste accumulation area was observed to be stained from spills or leaks and contained several cracks. The concrete containment area and concrete floor surrounding the storage tanks were stained from leaks or spills and contained several cracks.
- Nova identified potential PCB-containing equipment during their 2009 Phase I ESA, including: a
 pad-mounted transformer, waste compactor, dock levelers, and light ballasts. FTC&H confirmed the
 presence of the potential PCB-containing equipment during the May 2010 Phase I ESA Update and
 observed that the equipment was in good shape, with no evidence of releases of hydraulic or
 dielectric fluids.
- During their 2009 Phase I ESA, Nova identified suspect ACMs at the subject property, including: insulation, ceiling tile, drywall assemblies, and flooring and roofing materials. Nova collected representative samples of these materials for asbestos analysis. None of the tested materials were determined to contain regulated levels of asbestos (>1% asbestos by weight). One type of vinyl floor tile was determined to contain asbestos at a concentration less than 1%. Based on the age of the building, additional ACMs may exist. FTC&H conducted a visual assessment of the suspect ACM



identified by Nova. These materials appeared to have degraded slightly since April 2010 due to the lack of maintenance to the building; however, no additional suspect ACM were identified by FTC&H.



16.0 RECOMMENDATIONS

Based on the findings of this Phase I ESA Update, FTC&H recommends the following:

- A. The hazardous and non-hazardous waste materials remaining at the subject property should be properly characterized, labeled, and disposed at appropriate waste disposal facilities in accordance with federal and state regulations.
- B. Confirmed and suspect ACM should be managed-in-place in accordance with an Asbestos Operations and Maintenance Program.
- C. A Baseline Environmental Assessment and a Section 7a Compliance Analysis/Due Care Plan be conducted by NAI Farbman prior to receivership of the subject property according to Part 201 of the NREPA, Michigan Public Act 451, 1994 as amended.
- D. Determine with the MDNRE if the onsite groundwater monitoring wells associated with the former LUST investigation can be decommissioned and if so, have them properly abandoned by a licensed well driller.
- E. Verify the onsite pad-mounted transformer is non-PCB containing and affix the proper labeling. Continue to maintain and monitor the transformer, trash compactor and dock levelers for evidence of damage, leaks or spills. Immediately clean up any spills and repair any leaks or damages to this equipment upon detection. Prior to the removal of any light ballasts onsite, determined if they contain PCBs and, if so, store them according to federal, state, and local regulations until a PCB waste licensed transporter removes them to the appropriate disposal facility.



17.0 DEVIATIONS

In the process of conducting this Phase I ESA, the following deviations were made from the ASTM Standard:

- A. The State of Michigan does not publish two separate lists that are directly comparable to the NPL and CERCLIS listings. Michigan compiles a List of Contaminated Sites, which includes both sites that have been investigated and those requiring investigation. This one list serves the purpose of both the CERCLIS and NPL lists on a state level.
- B. In an effort to provide a more concise and usable document, FTC&H has deviated from the report format recommended in the ASTM Standard. The FTC&H format is cross referenced to the ASTM Standard format on a checklist provided in Appendix 9.

18.0 REFERENCES

18.1 LISTINGS

EDR Radius Map, Former Advanced Accessory Systems, 1721 Dove Street, Port Huron, Michigan 48060, December 28, 2010.

Ameristar Chain of Ownership Report, 1721 Dove Street, Port Huron, Michigan 48060, April 13, 2010.

The EDR Environmental LienSearch Report, 1721 Dove Street, Port Huron, Michigan 48060, December 13, 2010.

18.2 HISTORICAL RESOURCES

ASTM Standard E 1527-05, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

CRA, LUST Closure Report for SportRack Automotive (formerly MascoTech Accessories), September 13, 2004.

EMG Corporation, Phase I ESA of Advanced Accessory Systems, August 12, 2004.

FTC&H, Phase I ESA Update for Former Advanced Accessory Systems 1721 Dove Street, Port Huron, Michigan, May 2010.

FTC&H, Phase II ESA Update for Former Advanced Accessory Systems 1721 Dove Street, Port Huron, Michigan, May 2010.

Malcolm Pirnie, ESA Update of SportRack Automotive, October 30, 2002.

MDNRE-RRD and -WHMD files for: St. Clair Metal Products Company (subject property) – Facility 00012081; Earl Smith Distributing – Facility 000164/82; Earl S. Smith, Inc. – Facility 00008422; Coca-Cola Bottling Company of MI – Facility 00018776; Penske Truck Leasing Company, LP – Facility 00015566; Blue Water Area Trans. Commission – Facility 00034252; and Riverside Metal Products Company – Facility 00007534.

Nova, Phase I ESA for Advanced Accessory Systems, September 7, 2009.

Nova, Phase II ESA for Advanced Accessory Systems located at 1721 Dove Street and 2655 16th Street, Port Huron, Michigan 48060, October 27, 2009.

PSI, Operations & Maintenance Plan for Asbestos-Containing Materials, October 7, 2003.

U.S. Department of the Interior, Geological Survey Division Port Huron Quadrangle, 7.5-Minute Series (Topographic) dated 1991.

18.3 PERSONAL COMMUNICATIONS

Mr. John McMann, security guard - January 3, 2011

Mr. Mike Malcolm, St. Clair County Health Department - January 3, 2011

City of Port Huron Clerk's Office - January 3, 2011

Ms. Betty Child - City of Port Huron Building Department - January 5, 2011

Mr. Brooks Gordon, owner representative, Sport (MI) QRS 15-40, Inc. - April 29, 2010



19.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

We declare that, to the best of our professional knowledge and belief, we meet the definition of an Environmental Professional, as defined in 40 CFR §312.10.

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the *all* appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Assessment Conducted By:

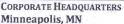
Assessment Reviewed By:

Sara M. Looney

Paul R. Morin, P.G.

Qualification statements for the FTC&H personnel responsible for conducting this Phase I ESA are provided as Appendix 10.

Appendix 1







September 7, 2009

Ms. Linda Sanchez Helios AMC 2 Embarcadero Center San Francisco, California 94111

RE: PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

ADVANCED ACCESSORY SYSTEMS 1721 DOVE STREET PORT HURON, MI 48060

NOVA PROJECT #: F09-1197

Dear Ms. Sanchez:

In accordance with our agreement, Nova Consulting Group, Inc. (Nova) has performed a Phase I Environmental Assessment of the above referenced property in accordance with ASTM E 1527-2005 and the Helios AMC ESA Scope of Work. Please find a copy of the report enclosed.

We declare that to the best of our knowledge and belief, we meet the definition of Environmental professional as defined in §312.10 of 40 CFR and, we have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Site. We have developed and performed all the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Respectfully submitted,

NOVA CONSULTING GROUP, INC.

Reviewed by:

Tiffany Darvell

Project Manager, E.P.

Gregory F. Murphy, R.E.A.

Vice President

PHASE I ENVIRONMENTAL SITE ASSESSMENT



ADVANCED ACCESSORY SYSTEMS 1721 DOVE STREET PORT HURON, MICHIGAN 48060

SEPTEMBER 7, 2009 NOVA PROJECT NO.: F09-1197



PHASE I ENVIRONMENTAL SITE ASSESSMENT

ADVANCED ACCESSORY SYSTEMS 1721 DOVE STREET PORT HURON, MICHIGAN 48060

PROJECT NO.: F09-1197 SEPTEMBER 7, 2009

PREPARED FOR:

HELIOS AMC
2 EMBARCADERO CENTER
SAN FRANCISCO, CALIFORNIA 94111
ATTENTION: MS. LINDA SANCHEZ

PREPARED BY:

NOVA CONSULTING GROUP, INC. 530 JACKSON STREET, 2ND FLOOR SAN FRANCISCO, CALIFORNIA 94133 (415) 377-2431

GREGORY F. MURPHY, R.E.A. VICE PRESIDENT



EXECUTIVE SUMMARY

Nova was authorized by Helios AMC to conduct a Phase I Environmental Site Assessment (ESA) of the Advanced Accessory Systems property located at 1721 Dove Street, Port Huron, Michigan 48060 ("the Site"). Nova has conducted this ESA in general accordance with the scope and limitations of ASTM Designation E 1527-2005, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process". There are no exceptions to, or deletions from the ASTM 1527-2005 standard practice and authorized Scope of Services.

This Executive Summary summarizes the key findings of this assessment based on information and data available to Nova during the performance of this project. The Executive Summary also presents Conclusions and Recommendations, which are based on the conditions existing at the time of the assessment. This summary does not contain all the information that is found in the full report. Detailed information regarding these findings is provided in the corresponding section of the text of the report. The report should be read in its entirety to obtain a more complete understanding of the information provided.

The following table summarizes the findings of the significant elements of this investigation.

| ASSESSMENT COMPONENT | Acceptable | Routine Solution | Phase II | Estimated Cost | Reference Section |
|----------------------------|------------|---------------------|-------------|--|----------------------|
| Historical Review | | | Х | \$20,000 | 3.0 |
| On-site Operations | Х | | | | 4.2 |
| Hazardous Materials | X | | | | 4.5 |
| Waste Generation | | X | | \$15,000 (Regulated waste disposal) | 4.6 |
| PCBs | X | | | | 4.7 |
| Asbestos | Х | | | | 4.9 |
| Lead in Drinking Water | Х | | | | 4.4 |
| Storage Tanks | Х | | | | 4.8 |
| Surface Areas | | X | | \$5,000 (Surface & AST Cleaning) | 4.3 |
| Regulatory Database Review | Х | | | | 5.0 |
| Adjoining Properties | Х | | | | 4.13 |
| Lead-Based Paint | Х | | | | 4.11 |
| Radon | X | | | | 4.10 |
| Mold | Х | | | | 4.12 |
| Dry Cleaners | Х | | | | 4.13 |
| Other | X | | | | 4.14 |
| Surrounding Properties | X | | | | 4.15 |



The Site includes approximately 5.51 acres improved with a one-story, 105,773 gross square foot industrial building with attached offices of slab-on-grade and steel-framed construction. Additional Site improvements include paved parking, drives, and service areas, landscaping, and loading docks. The Site is not currently developed with underground storage tanks (USTs), wells, wastewater treatment systems, or a septic system, but does contain two small aboveground storage tanks (ASTs). Heating and cooling in office areas is provided by combination heat pumps and split systems, and shop areas are heated by ceiling-mounted unit heaters and are ventilated with fans.

Paved parking and drive areas bound the north and west sides of the Site building. Landscaping surrounds the remainder. The Site improvements were constructed between 1966 and 1981. The building is currently vacant and was previously occupied by Advanced Accessory Systems that was an original equipment manufacturer (OEM) parts provider to the automotive industry. According to historical review, the following activities were conducted on the Site:

- The building was previously used for fabrication of metal roof rack systems, warehousing of raw materials for roof rack system fabrication, and office areas. The following activities were associated with the manufacturing activities:
 - Hazardous waste generation notification under RCRA;
 - NPDES wastewater permit for operations discharging wastewater containing oil associated with exterior ASTs;
 - Operation and removal of five (5) underground storage tanks (USTs);
 - Investigation of groundwater contamination associated with operation of USTs.
- Currently, the Site is vacant as Advanced Accessory Systems is no longer in business, and manufacturing equipment has recently been removed from the Site by a rigging contractor as part of sale of assets.

The general vicinity of the Site is occupied by warehouse and light industrial facilities. Current uses of adjoining properties include a vacant lot east of the DHL warehouse structure at 2654 20th Street to the northwest and Advanced Accessory Systems at 2655 16th Street to the northeast, the vacant Crown Group facility at 1631 Dove Street to the east, the Pro Weld facility at 1720 Dove Street to the southeast and Earl Smith Distributors at 1730 Dove Street to the south, and the Norman G Jensen Warehouse facility at 1915 Dove Street to the west.

The available historical information indicates the Site was undeveloped land as far back as 1938 and remained undeveloped until the start of development of the current manufacturing facility starting in 1966. The current facility was constructed in phases between 1966 and 1981 as described below. According to the Planning Department field sheet, the southern ½ of the south ½ of the main eastern shop area (19,348 SF) and office was constructed in 1966 and the northern ½ of the south ½ of the main eastern shop area (14,510 SF) was constructed in 1967. The north ½ of the main eastern shop area (34,668)



SF) was constructed in 1971. The western addition (17,160 SF) to the north $\frac{1}{2}$ of the main eastern shop area was constructed in 1972. The far western 'L'-shaped addition (13,201 SF) to the north $\frac{1}{2}$ of the main eastern shop area was constructed in 1981. The connector structure to the 2655 16th Street facility and eastern addition to the southern $\frac{1}{2}$ of the south $\frac{1}{2}$ of the main eastern shop area were constructed in 1990.

The following addresses were determined to have historically corresponded to the Site: 1721 and 1723 Dove Street. The directories listed the operator of the site from 1968 to the present as follows:

| YEAR | LISTING | |
|--|---|--|
| 1968 Huron Manufacturing – 1723 Dove Street | | |
| 1974 St Clair Metal Products – 1721 Dove Street | | |
| 1980 | Huron St Clair (Div. of Masco) – 1721 Dove Street | |
| 1986 | St Clair Metal Products – 1721 Dove Street | |
| 1992 Huron St Clair (Div. of Masco) – 1721 Dove Street | | |
| 1998 | 1998 Non Published – 1721 Dove Street | |
| 2004 Sport Rack Automotive – 1721 Dove Street | | |

Overall, historic uses of the Site are expected to have resulted in current impacts to the Site based on the following information:

 Five USTs were formerly operated when the Site was occupied by St. Clair Metal Products; these USTs have been removed. A release was reported from the USTs, and the LUST case has been closed; however, the database review indicates that subsurface contamination still exists. Additionally, the Site was listed on the State Hazardous Waste Site and Baseline Environmental Assessment databases.

Nova conducted limited asbestos, lead-based paint and radon testing as part of this assessment. Nova collected 27 samples of suspect ACM, which included samples primarily of ceiling materials, drywall assembly materials, and flooring. According to laboratory analysis, one sample of vinyl floor tile contained trace amounts of asbestos (<1% chrysotile) and no asbestos was detected in the 26 remaining samples. Other suspect ACMs observed at the Site include roofing materials.

Nova collected three (3) water samples for analysis for total lead at the Site. The presence of lead in water was not indicated during this limited lead survey.

Two radon canisters were utilized to conduct radon testing at the Site. The results of the radon testing were below the EPA action level.

FINDINGS AND CONCLUSIONS

Nova has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-05 of Advanced Accessory Systems, 1721 Dove Street, Port Huron, Michigan. Any exceptions to or deletions from this practice are described in Section 4.1 of this report.



This assessment has revealed evidence of recognized environmental conditions in connection with the Site, including the following:

- Database St. Clair Metal Products at 1721 Dove Street is listed on the SHWS database. The SHWS database identifies the Site as an inactive hazardous waste site where no actions taken to address contamination. No additional information regarding contaminants of concern or regulatory status in regards to the Part 201 Program were provided. The listing has the potential to have affected subsurface conditions at the Site as well as regulatory compliance issues; therefore, this listing represents a recognized environmental condition. Nova has made a FOIA request with the MDEQ to review the Waste Management Division and Remediation and Redevelopment Division (RRD) Part 201 files regarding the subsurface contaminant concentrations as well as compliance with the Part 201 Program. This information was not received in the time frame of this report and is considered not reasonably ascertainable. Additionally, Nova was informed by Mr. Greg Barrows of the RRD that the Part 201 files could not be located with the MDEQ system.
- Database St. Clair Metal Products at 1721 Dove Street is listed on the LUST database. The LUST database identifies the Site as having the release number C-0288-89 that was closed in 2004. Although the database indicates that the case has been closed, it does not indicate that contaminants do not still exist in the subsurface. Additionally, the MDEQ Storage Tank Information Database indicates that a Tier I Evaluation was conducted with a Deed Restriction to obtain closure under the Part 213 Program indicating that contaminant levels have exceeded MDEQ Generic Cleanup Criteria. The closure may prohibit certain future unrestricted use of the property; therefore, although this listing does not represent a regulatory compliance issue, the closure type represents a recognized environmental condition.
- Database A former tenant, Sportrack Port Huron at 1721 Dove Street, is listed on the Baseline Environmental Assessment (BEA) database. The BEA database identifies the Site as having submitted the BEA for this facility in 2004 on behalf of W.P. Carey & Company LLC. The BEA was prepared because the land was determined to contain hazardous substances at levels that would deem the Site a 'facility' as defined by Part 201 of NREPA. A 'facility' is any property where hazardous substances were found at levels that exceed relevant Generic Residential Cleanup Criteria. The BEA was submitted as a Category D BEA, which means that different hazardous substances intended to be utilized at the 'facility' than the type of hazardous substances found to contaminate the subsurface. Nova has made a FOIA request with the MDEQ to review the RRD Part 201 files regarding the site to determine what contaminant levels exist on the property in regards to the BEA submittal. However, as stated above, the Part 201 files could not be located by RRD staff in the MDEQ system.

In summary, the overall use of the Site for industrial/manufacturing purposes from approximately 1968 through approximately 2008 is considered cause for cumulative concern related to general subsurface environmental conditions and justification for additional subsurface investigation.



Additionally, the following items of environmental concern were noted that warrant mention.

- Wells Approximately 11 groundwater monitoring wells were observed on the southern portion of the Site, south of the building in an unsecured area outside of the fence line. These monitoring wells are associated with the former investigation of the leaking USTs that are discussed in Section 5.2. It should be determined by the MDEQ whether all or a portion of the monitoring wells are needed to comply with any future requirements associated with the investigation remedy. If not, then these monitoring wells should be abandoned by a licensed well driller to prevent any potential introduction of hazardous materials to the subsurface by vandalism or accidental release. In the interim, these wells should be monitored to ensure that the well caps are locked.
- Waste Evidence of spills, leaks, overflows, or potential routes of entry to the subsurface were observed in association with the area of concrete floor containing a mixture of water, soluble oil and non-soluble oil next to the area of drum accumulation in the northwest portion of the shop area (See Site Plan Figure).
- Waste There were several off-specification and/or waste drums, totes, storage tanks, and smaller containers detailed in Section 4.6 located within the shop area that remain in the facility after cessation of operations that should be disposed as RCRA Hazardous or Michigan Industrial wastes. The waste materials need to be properly profiled and submitted to appropriate waste disposal facilities for approval and ultimate disposal. Additionally, these drums should be properly labeled and disposed in accordance with RCRA regulations in regards to length of accumulation.
- Waste Evidence of spills, leaks, overflows, or potential routes of entry to the subsurface were observed in association with the observed above ground tanks located in the oil house northwest of the facility. The concrete containment surrounding the oil and wastewater tanks was observed to contain oil and water as well as the concrete floor outside of the containment area. Additionally, the tanks may still contain waste materials that will require proper disposal.
- Permitting The Site was listed as a National Pollutant Discharge Elimination System (NPDES) facility. This former tenant, Sportrack Automotive at 1721 Dove Street is listed on the NPDES database that identifies the Site having a permit to discharge wastewater under Permit Number MIS410519 that was issued 4/1/04 and expired 4/1/09. There was no other information provided. As such, while this regulatory status by itself is not necessarily indicative of subsurface contamination, the overall use of the Site for industrial/manufacturing purposes from approximately 1968 through approximately 2008 (during which Sportrack Automotive was a tenant) is considered cause for cumulative concern related to general subsurface environmental conditions and justification for additional subsurface investigation as prescribed herein.
- Trace amounts of asbestos was identified in a vinyl floor tile on-Site. Additionally, based on the age of the Site building, the building materials may contain asbestos.



RECOMMENDATIONS

Based on the findings of this Phase I Environmental Site Assessment, Nova recommends the following:

- Waste The material on the floor area near the drums should be removed and the area cleaned and inspected to determine if there are any routes where the material may have migrated to the subsurface. The material removed from the floor area and cleaning residue should be disposed in accordance to RCRA and Michigan waste regulations.
- Waste The off-specification chemicals in waste drums, totes, storage tanks, and smaller containers detailed in Section 4.6 are waste materials that need to be properly profiled and submitted to appropriate waste disposal facilities for approval and ultimate disposal. Additionally, these drums should be properly labeled and disposed in accordance with RCRA regulations in regards to length of accumulation.
- Waste The material on the floor areas and within the containment in the oil shed should be removed and the areas cleaned and inspected to determine if there are any routes where these materials may have migrated to the subsurface. The material contained in the ASTs should be removed and disposed, along with the materials removed from the floor and containment area, in accordance to RCRA and Michigan waste regulations.
- Proper closure conditions of the NPDES permit that was issued by the MDEQ should be determined.
- These areas described above, as well as the areas formerly having contained the USTs should be investigated for the potential remaining presence of contaminants in the subsurface. This investigation should include sampling of the existing wells on the south side of the Site.
- Suspect asbestos-containing materials should continue to be managed in-place in good condition under an Asbestos Operations & Maintenance Program. Such a plan was prepared by EMG, Inc., dated October 4, 2004.



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1.0 PROJECT DESCRIPTION

1.1 Site Description

| Site Address | 1721 Dove Street, Port Huron, St. Clair, Michigan, 48060 |
|------------------------------------|---|
| Topographic Location | SE ¼ of Section 16, Township 6N, Range 17E |
| Tenant Description | Former ADVANCED ACCESSORY SYSTEMS, Manufacturer of original equipment manufacturer (OEM) automobile parts |
| Site Acreage, Building Description | Acreage: 5.51 acres; Building description: 105,773 square feet; one-story, steel frame, slab-on-grade |
| Site Exterior | Landscaping, paved parking & drive areas, loading docks |

The Site includes approximately 5.51 acres improved with a one-story, 105,773 gross square foot industrial building with attached offices of slab-on-grade and steel-framed construction. Additional Site improvements include paved parking, drives, and service areas, landscaping, and loading docks. The Site is not currently developed with underground storage tanks (USTs), wells, wastewater treatment systems, or a septic system, but does contain two small aboveground storage tanks (ASTs). Heating and cooling in office areas is provided by combination heat pumps and split systems, and shop areas are heated by ceiling-mounted unit heaters and are ventilated with fans.

Paved parking and drive areas bound the north and west sides of the Site building. Landscaping surrounds the remainder. The Site improvements were constructed between 1966 and 1981. The building is currently vacant and was previously occupied by Advanced Accessory Systems that was an original equipment manufacturer (OEM) parts provider to the automotive industry. According to historical review, the following activities were conducted on the Site:

- The building was previously used for fabrication of metal roof rack systems, warehousing of raw materials for roof rack system fabrication, and office areas. The following activities were associated with the manufacturing activities:
 - Hazardous waste generation notification under RCRA;
 - NPDES wastewater permit for operations discharging wastewater containing oil associated with exterior ASTs;
 - Operation and removal of five (5) underground storage tanks (USTs);
 - Investigation of groundwater contamination associated with operation of USTs.
- Currently, the Site is vacant as Advanced Accessory Systems is no longer in business, and manufacturing equipment has recently been removed from the Site by a rigging contractor as part of sale of assets.



A copy of a portion of the topographic map of the area, with the Site location marked, is included as Figure 1.

1.2 Purpose

The purpose of this ESA was to identify the potential for *recognized environmental conditions* to exist at the Site. The term recognized environmental conditions means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

Nova understands this ESA is also being completed to assist in qualifying for Landowner Liability Protections (LLPs) under CERCLA unless otherwise so stated in this report.

Environmental issues or concerns at a property that are outside the scope of ASTM E1527-2005 that parties may wish to assess in connection with commercial real estate transactions include, but are not limited to the following: asbestos-containing materials, radon, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, health and safety, ecological resources, endangered species, indoor air quality, and high voltage (EMF) power lines. These items, unless requested by the client or as deemed relevant to a Site on a case-specific basis, are not included in this ESA.

1.3 Reliance

This report is addressed to Helios AMC ("Helios") and its affiliates. Helios and its affiliates, their respective successors and assigns (including, without limitation, investors who purchase the mortgage loan or a participation interest in the mortgage loan and the trustee in a securitization that includes the mortgage loan), each servicer of the mortgage loan, and all rating agencies involved in any sale, securitization or syndication involving the mortgage loan may use and rely upon this Report, including, without limitation, utilizing selected information from the Report in the offering materials (either in electronic or hard copy format) relating to any sale, securitization or syndication involving the mortgage loan. The Consultant agrees to cooperate in answering questions by any of the above parties in connection with the sale, securitization or syndication, as communicated by Helios personnel. In addition, this Report or a reference to this Report may be included or quoted in any offering circular, registration statement, prospectus or sales brochure (either in electronic or hard copy format) in connection with a sale, securitization or syndication, or transaction involving such debt and or debt securities.



1.4 Scope of Services

Nova's Scope of Services for this Phase I ESA conforms with the American Society for Testing and Materials (ASTM) due diligence standards detailed in the ASTM document "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process" (ASTM designation E1527-2005) and Helios AMC's specific scope of work. Services provided for this project included:

- A review of readily available topographic, geologic, and hydrogeologic information pertaining to the Site and surrounding area;
- A review of readily available information regarding historical land use activities at the Site, and interviews with people that have knowledge regarding the past or present uses of the Site, and with present and past owners, operators, and occupants of the Site, where feasible;
- A reconnaissance of the Site to visually and physically observe the Site for evidence of potential recognized environmental conditions;
- A limited review of federal, state, and local regulatory information records for reported potential environmental hazards on or in the vicinity of the Site;
- Limited sampling and analysis for asbestos, lead in drinking water, and radon; and
- Review of previous environmental reports, if available.
- No lead-based paint sampling or analytical testing was conducted as part of this Phase I ESA.
- This Phase I ESA does not constitute a regulatory compliance audit of the Site; however, any obvious issues of noncompliance are noted in the report. Copies of resumes of Nova staff involved in the preparation of this report are included as Appendix A.

1.5 User's Responsibilities & Obligations

Brooks Gordon, Site contact, has not reported the existence of any environmental liens encumbering the Site property. Brooks Gordon did not report specialized knowledge and experience which provides important information regarding previous ownership or use of the Site which is material in identifying recognized environmental conditions.

Previous environmental investigations were conducted for the Site. The following is a summary of the reports reviewed.

<u>Phase I Environmental Site Assessment, Advanced Accessory Systems, EMG, October 4, 2004</u>: The assessment identified recognized environmental conditions as well as asbestos containing materials. The report included the following findings, conclusions, and recommendations:

Operations & Maintenance (O&M) Plan for presumed ACMs.



- The adjacent site to the east was identified on the database, but no adverse health affects to Site was anticipated and no further investigation was necessary.
- The Site was an active LUST site that resulted in contamination that closure would be requested from the MDEQ. EMG recommended regulatory file review to determine LUST regulatory status.

The report is discussed further in Section 3.7 and a copy of the report is included in Appendix F.

1.6 Limitations and Exceptions

The findings and conclusions contain all of the limitations inherent in these methodologies that are referred to in ASTM 1527-05. Specific limitations and/or exceptions to this ESA are more specifically set forth below:

- Prior Site owners, operators, and current adjoining property owners were not available
 for interview. The history of the Site was established as undeveloped land prior to the
 current developments at the Site. It is Nova's opinion that the lack of interviews with
 prior Site and adjoining property owners is not critical and does not alter the
 conclusions or recommendations of this assessment.
- Nova was unable to determine the installation dates and PCB-status of the transformers located on the Site as there were no persons involved with previous operations available for interview and previous operations records were unavailable. Based on the good condition of the transformers observed, they are not expected to have an environmental impact on the subsurface conditions at the Site.



2.0 HYDROGEOLOGIC SETTING

Readily available hydrogeologic information was reviewed to evaluate surface and subsurface characteristics in the vicinity of the Site. This section summarizes the results of the hydrogeologic evaluation. Information reviewed for this project is listed in the Reference Section.

2.1 Geologic Setting

Published geologic information indicates the following:

| Topographic Site Elevation | ~605 feet above mean sea level | | |
|---|--|--|--|
| Surficial Materials | The surficial geology near the Site consists of up to 200 feet of glacial till deposited over Mississippian and Mississippian-Devonian sedimentary rocks in the Bedford and Antrim Shale formation. The glacial tills typically contain sand and a confining clay bed that overlie the bedrock layer. According to the Water Well and Pump Record for wells situated in the vicinity of the Property, obtained from the Michigan Department of Environmental Quality (MDEQ) Well Record Retrieval System (via the Internet), there is a 12 feet of sand that overlies a 100' layer of blue clay. | | |
| First Bedrock Beneath the Site, Physiographic Province / Geologic Age | The Site is situated on the northeastern portion of the Interior Plains Province directly southeast of the Michigan Basin. Glacial till is deposited over Mississippian-Devonian sedimentary rocks in the Bedford and Antrim Shale formation. | | |
| Estimated depth to Bedrock beneath Site | Bedford Shale is 112 to 132 feet below the ground surface and Antrim Shale is 132 to 272 feet below the ground surface | | |

2.2 Area Hydrogeology

Published hydrogeologic maps indicate the following:

| Depth to groundwater beneath Site | < 12 feet below the ground surface for surficial perched groundwater and 100-120 feet in bedrock | | |
|-------------------------------------|--|--|--|
| Regional groundwater flow direction | Southeast, towards the St. Clair River, which is 0.35 mile southeast of the Site | | |
| Sole source aquifer (if present) | The Site does not overlie a sole source aquifer. The closest aquifer beneath the Site is located in the surficial upper sand layer and is unconfined but typically not a good source of useable groundwater. | | |

(Groundwater flow direction is estimated based on a review of published maps. Site specific groundwater flow conditions may be impacted by a variety of factors including, but not limited to, local topography, geologic anomalies, utilities, nearby wells or sumps, and local drainage patterns. Site specific groundwater information would require a groundwater investigation, which is beyond the scope of this ESA.)



2.3 Records of Water Wells

Nova reviewed Water Well and Pump Record for wells situated in the vicinity of the Site, obtained from the Michigan Department of Environmental Quality (MDEQ) Well Record Retrieval System (via the Internet). These well records were compiled by the MDEQ from drilling records and well log records submitted to the agency. No well records were on file for the Site.

2.4 Hydrologic & Topographic Conditions

The Site topography is generally level. Surface water drainage is expected to flow into storm water drains located in the Site parking lot and adjacent streets.

2.5 Flood Zone Information

A review of the Flood Insurance Rate Maps, published by the Federal Emergency Management Agency, was performed. According to Panel Number 260204 0005B, dated December 1, 1978, the Site is located in Flood Zone C. Flood Zone C regions consist of areas of minimal flooding. The distance to the nearest 100-year flood plain is approximately 1,500' to the southeast.

2.6 Wetlands

Nova researched the United States Fish and Wildlife Service Wetlands Geodatabase for the presence of wetlands on the Site. Based on the records review, wetlands are not mapped on the Site or adjoining properties. Evidence of wetlands was not observed on the Site during the Site reconnaissance. This review does not constitute formal wetlands delineation.



3.0 HISTORICAL LAND USE REVIEW

Readily available historical information was reviewed to evaluate the previous uses of the Site, and previous uses of properties in the vicinity of the Site. This section summarizes the results of the historical evaluation. Information reviewed for this project is listed in the Reference Section. Additionally, exceptions to ASTM requirements for review of historical information is described in Section 1.6, herein.

3.1 Site Use Summary

The available historical information indicates the Site was undeveloped land as far back as 1938 and remained undeveloped until the start of development of the current manufacturing facility starting in 1966. The current Site facilities were constructed in phases between 1966 and 1981 as follows:

The research indicates that the current structure was constructed in phases between 1966 and 1981. According to the field sheet, the southern $\frac{1}{2}$ of the south $\frac{1}{2}$ of the main eastern shop area (19,348 SF) and office was constructed in 1966 and the northern $\frac{1}{2}$ of the south $\frac{1}{2}$ of the main eastern shop area (14,510 SF) was constructed in 1967. The north $\frac{1}{2}$ of the main eastern shop area (34,668 SF) was constructed in 1971. The western addition (17,160 SF) to the north $\frac{1}{2}$ of the main eastern shop area was constructed in 1972. The far western 'L'-shaped addition (13,201 SF) to the north $\frac{1}{2}$ of the main eastern shop area was constructed in 1981. The connector structure to the 2655 16th Street facility and eastern addition to the southern $\frac{1}{2}$ of the south $\frac{1}{2}$ of the main eastern shop area were constructed in 1990.

The following addresses were determined to have historically corresponded to the Site: 1721 and 1723 Dove Street. The directories listed the operator of the site from 1968 to the present as follows:

| YEAR | LISTING |
|------|---|
| 1968 | Huron Manufacturing – 1723 Dove Street |
| 1974 | St Clair Metal Products – 1721 Dove Street |
| 1980 | Huron St Clair (Div. of Masco) – 1721 Dove Street |
| 1986 | St Clair Metal Products – 1721 Dove Street |
| 1992 | Huron St Clair (Div. of Masco) – 1721 Dove Street |
| 1998 | Non Published – 1721 Dove Street |
| 2004 | Sport Rack Automotive – 1721 Dove Street |

Overall, historic uses of the Site are expected to have resulted in current impacts to the Site based on the following information:

 Five USTs were formerly operated when the Site was occupied by St. Clair Metal Products; these USTs have been removed. A release was reported from the USTs, and the LUST case has been closed; however, the database review indicates that subsurface



contamination still exists. Additionally, the Site was listed on the State Hazardous Waste Site and Baseline Environmental Assessment databases.

In summary, the overall use of the Site for industrial/manufacturing purposes from approximately 1966 through approximately 2000 is considered cause for cumulative concern related to general subsurface environmental conditions and justification for additional subsurface investigation.

Surrounding properties were generally vacant land as far back as 1937 until development with warehouse and manufacturing facilities starting in the late 1960s. The surrounding parcels are summarized as follows:

North – The land to the northwest has been undeveloped since 1937. The land to the northeast was vacant land as far back as 1937, and was developed as a manufacturing facility starting in 1968 that has operated as an Advanced Accessory Systems 'sister' plant (2655 16th Street) to the Site. While no acute locations or specific activities were found on this property which by themselves are considered recognized environmental conditions, the overall use of the property for industrial/manufacturing purposes from approximately 1968 through approximately 2008 is considered cause for cumulative concern related to general subsurface environmental conditions. The Phase II subsurface investigation recommended for the Site would be expected to reveal any significant concerns having originated from this adjacent property to the north.

East - The land to the east was vacant land as far back as 1937, and was developed as a manufacturing facility starting between 1964 and 1968. No historical operations or database listings have expected to have impacted the Site.

South – The land to the southeast was vacant land as far back as 1937, and was developed as a warehouse and distribution facility starting in 1964. This facility operated USTs that have been removed from the ground and had leaked. The leaking UST issues have been closed. No historical operations or database listings have expected to impact the Site. The land to the southwest was vacant land as far back as 1937, and was developed as a warehouse and distribution facility starting between 1970 and 1974. This facility operated USTs that have been removed from the ground and had leaked. The leaking UST issues have been closed. No historical operations or database listings have expected to have affected conditions at the Site.

West - The land to the east was vacant land as far back as 1937, and was developed as a warehouse and manufacturing facility to the southwest starting between 1964 and 1968 with construction of a larger warehouse to the northeast between 1992 and 2000. No historical operations or database listings have expected to have impacted the Site.

Based on information discussed below, historic uses of the surrounding properties are not expected to have resulted in current impact to the Site.



3.2 Sanborn Fire Insurance Maps

Fire insurance maps were created for insurance underwriters and often contain information regarding the uses of individual structures, and the locations of fuel and/or chemical storage tanks which may have been on a particular property. Review of EDR's Sanborn fire insurance map collection indicated that no maps have been prepared for the Site area. A copy of the No Coverage Letter is included in Appendix B.

3.3 Aerial Photographs

Aerial photographs for the Site area were obtained from EDR. Photographs for the years 1938, 1941, 1949, 1956, 1964, 1970, 1980, 1985, 1992, 2000, and 2005 were reviewed for this ESA. Copies of the 1938, 1941, 1949, 1956, 1964, 1970, 1980, 1985, 1992, 2000, and 2005 photographs are included in Appendix B.

3.3.1 Past Site Uses

| YEAR(S) | USE |
|---------|---|
| 1938 | Undeveloped land |
| 1941 | Undeveloped land |
| 1949 | Undeveloped land |
| 1956 | Undeveloped land |
| 1964 | Undeveloped land |
| 1970 | Southeastern portion of the current building structure. No obvious evidence of recognized environmental conditions observed. |
| 1980 | Eastern and northwestern portion of the current building structure with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |
| 1985 | Current building structure in its current configuration with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |
| 1992 | Current building structure in its current configuration with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |
| 2000 | Current building structure in its current configuration with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |
| 2005 | Current building structure in its current configuration with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |

No previous uses indicative of obvious environmentally suspect practices or activities were identified on the Site.

3.3.2 Past Adjacent Property Uses

| 1938 | |
|-----------|------------------|
| Direction | Use |
| North | Undeveloped land |
| East | Undeveloped land |
| South | Undeveloped land |
| West | Undeveloped land |



| 1941 | |
|-----------|------------------|
| Direction | Use |
| North | Undeveloped land |
| East | Undeveloped land |
| South | Undeveloped land |
| West | Undeveloped land |

| 1949 | 1949 | |
|-----------|------------------|--|
| Direction | Use | |
| North | Undeveloped land | |
| East | Undeveloped land | |
| South | Undeveloped land | |
| West | Undeveloped land | |

| 1956 | 1956 | |
|-----------|------------------|--|
| Direction | Use | |
| North | Undeveloped land | |
| East | Undeveloped land | |
| South | Undeveloped land | |
| West | Undeveloped land | |

| 1964 | |
|-----------|---|
| Direction | Use |
| North | Undeveloped land |
| East | Undeveloped land |
| South | The current warehouse building to the east in its current configuration and vacant land to the west. No obvious evidence of recognized environmental conditions observed. |
| West | Undeveloped land |

| 1970 | |
|-----------|--|
| Direction | Use |
| North | The site has been developed with the eastern portion of the shop area of the current structure with current parking and service areas to the north. No obvious evidence of recognized environmental conditions observed. |
| East | The current industrial building in its current configuration. No obvious evidence of recognized environmental conditions observed. |
| South | The current warehouse building to the east in its current configuration and vacant land to the west. No obvious evidence of recognized environmental conditions observed. |
| West | Vacant land to the north and smaller warehouse building farther to the southwest. No obvious evidence of recognized environmental conditions observed. |

| 1980 | |
|-----------|--|
| Direction | Use |
| North | East and west shop area and office portion of the current building structure in their current configuration with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |



| 1980 | 1980 | |
|-----------|--|--|
| Direction | Use | |
| East | The current industrial building in its current configuration. No obvious evidence of recognized environmental conditions observed. | |
| South | The current warehouse buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. | |
| West | Vacant land to the north and smaller warehouse building farther to the southwest. No obvious evidence of recognized environmental conditions observed. | |

| 1985 | |
|-----------|--|
| Direction | Use |
| North | East and west shop area and office portion of the current building structure in their current configuration with current parking and service areas to the north and west. No obvious evidence of recognized environmental conditions observed. |
| East | The current industrial building in its current configuration. No obvious evidence of recognized environmental conditions observed. |
| South | The current warehouse buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. |
| West | Vacant land to the north and smaller warehouse building farther to the southwest. No obvious evidence of recognized environmental conditions observed. |

| 1992 | 1992 | |
|-----------|---|--|
| Direction | Use | |
| North | NE - Current building structure in its current configuration with current parking and service areas to the north and west. NW – Vacant land with the current warehouse building farther to the west. No obvious evidence of recognized environmental conditions observed. | |
| East | The current industrial building in its current configuration. No obvious evidence of recognized environmental conditions observed. | |
| South | The current warehouse buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. | |
| West | Vacant land to the north and smaller warehouse building farther to the southwest. No obvious evidence of recognized environmental conditions observed. | |

| 2000 | | |
|-----------|---|--|
| Direction | Use | |
| North | NE - Current building structure in its current configuration with current parking and service areas to the north and west. NW – Vacant land with the current warehouse building farther to the west. No obvious evidence of recognized environmental conditions observed. | |
| East | The current industrial building in its current configuration. No obvious evidence of recognized environmental conditions observed. | |
| South | The current warehouse buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. | |
| West | The surrout wards are building in its current configuration to the north and smaller war | |



| 2005 | | |
|-----------|---|--|
| Direction | Use | |
| North | NE - Current building structure in its current configuration with current parking and service areas to the north and west. NW — Vacant land with the current warehouse building farther to the west. No obvious evidence of recognized environmental conditions observed. | |
| East | The current industrial building in its current configuration. No obvious evidence of recognized environmental conditions observed. | |
| South | The current warehouse buildings in their current configuration. No obvious evidence of recognized environmental conditions observed. | |
| West | The current warehouse building in its current configuration to the north and smaller warehouse building farther to the southwest. No obvious evidence of recognized environmental conditions observed. | |

No previous uses indicative of obvious environmentally suspect practices or activities were identified at the surrounding properties.

3.4 City Directories

City directories provide listings, arranged by street address, of facilities for the year the directory was published. Port Huron City Directories and Port Huron/St. Clair County Donnelly Directories were reviewed at the St. Clair District Library for the years of 1938, 1946, 1953, 1957, 1963, 1968, 1974, 1980, 1986, 1992, and 2004. A summary of information reviewed is included in the following tables. Copies of the city directory information are included as Appendix D.

| YEAR(S) | PAST SITE USES | |
|---------|--|--|
| 1938 | No Listing | |
| 1946 | No Listing | |
| 1953 | No Listing | |
| 1957 | No Listing | |
| 1963 | No Listing | |
| 1968 | Huron Manufacturing – 1723 Dove Street | |
| 1974 | St. Clair Metal Products – 1721 Dove Street | |
| 1980 | Huron St Clair (Div. of Masco) – 1721 Dove Street | |
| 1986 | St. Clair Metal Products – 1721 Dove Street | |
| 1992 | Huron St. Clair (Div. of Masco) – 1721 Dove Street | |
| 1998 | NP – 1721 Dove Street | |
| 2004 | Sport Rack Automotive – 1721 Dove Street | |

Overall, historic uses identified in listings of the Site do not show obvious listings that would be expected to have resulted in current impacts to the Site.

| SURROUNDING PROPERTY USES IN 1938 | |
|-----------------------------------|------------|
| Adjacent to the north | No Listing |
| Adjacent to the east | No Listing |
| Adjacent to the south | No Listing |
| Adjacent to the west | No Listing |



| SURROUNDING PROPERT | Y USES IN 1946 |
|-----------------------|---|
| Adjacent to the north | No Listing |
| Adjacent to the east | No Listing |
| Adjacent to the south | No Listing |
| Adjacent to the west | No Listing |
| SURROUNDING PROPERT | TY USES IN 1953 |
| Adjacent to the north | No Listing |
| Adjacent to the east | No Listing |
| Adjacent to the south | No Listing |
| Adjacent to the west | No Listing |
| SURROUNDING PROPERT | TY USES IN 1957 |
| Adjacent to the north | No Listing |
| Adjacent to the east | No Listing |
| Adjacent to the south | No Listing |
| Adjacent to the west | No Listing |
| SURROUNDING PROPERT | TY USES IN 1963 |
| Adjacent to the north | No Listing |
| Adjacent to the east | No Listing |
| Adjacent to the south | No Listing |
| Adjacent to the west | No Listing |
| SURROUNDING PROPER | TY USES IN 1968 |
| Adjacent to the north | No Listing |
| Adjacent to the east | Lexington Molding Co. – 1631 Dove Street; Huron Manufacturing – 1723 Dove Street |
| Adjacent to the south | Earl Smith Inc- 1720 Dove Street |
| Adjacent to the west | Hallett Manufacturing Co. (Radio Equipment) – 1915 Dove Street |
| SURROUNDING PROPER | |
| Adjacent to the north | Huron St Clair (Div. of Masco) – 2655 16 th Street |
| Adjacent to the east | Howard Automotive Products – 1631 Dove Street |
| Adjacent to the south | Earl Smith Inc- 1720 Dove Street; Earl Smith Distributing (beer) - 1732 Dove Street |
| Adjacent to the west | Bindacator Co. (control systems) – 1915 Dove Street |
| SURROUNDING PROPER | |
| Adjacent to the north | Huron St Clair (Div. of Masco) – 2655 16 th Street |
| Adjacent to the east | Riverside Metal Products – 1631 Dove Street |
| Adjacent to the south | Earl Smith Inc-1720 Dove Street; Earl Smith Distributing (beer) - 1732 Dove Street |
| Adjacent to the west | Bindacator Co. (industrial supplies) – 1915 Dove Street |
| SURROUNDING PROPER | |
| Adjacent to the north | St Clair Metal Products – 2655 16 th Street |
| Adjacent to the east | Riverside Metal Products – 1631 Dove Street |
| Adjacent to the south | Earl Smith Inc- 1720 Dove Street; Earl Smith Distributing (beer) - 1732 Dove Street |
| Adjacent to the west | Bindacator Co. (industrial supplies) – 1915 Dove Street |



| SURROUNDING PROPERT | |
|-----------------------|---|
| Adjacent to the north | Huron St Clair (Div. of Masco) – 2655 16 th Street |
| Adjacent to the east | Riverside International – 1631 Dove Street |
| Adjacent to the south | Earl Smith Freight— 1720 Dove Street; Earl Smith Distributing (beer) — 1732 Dove Street |
| Adjacent to the west | Bindacator Co. (industrial supplies) – 1915 Dove Street |
| SURROUNDING PROPERT | Y USES IN 1998 |
| Adjacent to the north | Sport Rack Automotive – 2655 16 th Street |
| Adjacent to the east | Crown Group – 1631 Dove Street |
| Adjacent to the south | NP – 1720 Dove Street; Earl Smith Distributing – 1730 Dove Street |
| Adjacent to the west | Bindacator Co – 1915 Dove Street |
| SURROUNDING PROPERT | Y USES IN 2004 |
| Adjacent to the north | Sport Rack Accessories – 2655 16 th Street |
| Adjacent to the east | Crown Group – 1631 Dove Street |
| Adjacent to the south | Pro Weld – 1720 Dove Street; Earl Smith Distributing – 1730 Dove Street |
| Adjacent to the west | Bindacator / Norman G Jensen Inc – 1915 Dove Street |

Based on information presented in the city directories, historic uses identified in listings of surrounding properties do not show obvious listings that would be expected to have resulted in current impacts to the Site.

3.5 Local Agency Review

3.5.1 Port Huron Inspection Department

| CONTACT NAME SOURCE TYPE PHONE NUMBER | COMMENTS |
|---|---|
| FOIA Request Inspection Department 100 McMorran Boulevard Port Huron, Michigan 48060 810-984-9733 | Nova made a written Freedom of Information Act (FOIA) request for records from the Port Huron Inspection Department for the Site. These records may contain information regarding historical tenants, construction records, and property use of the Site. According to the response from the department, no records exist for the Site. |
| | Copies of the FOIA Request and department response are attached as Appendix F. |

3.5.2 Port Huron Planning/Zoning Department

| CONTACT NAME SOURCE TYPE PHONE NUMBER | COMMENTS |
|--|--|
| FOIA Request Planning/Zoning Department 100 McMorran Boulevard Port Huron, Michigan 48060 810-984-9735 | Nova made a written Freedom of Information Act (FOIA) request for records from the Port Huron Planning/Zoning Department for the Site. These records may contain information regarding historical development. According to the response from the department, no records exist for the Site. Copies of the FOIA Request and department response are attached as Appendix F. |



3.5.3 Port Huron Assessor

| CONTACT NAME SOURCE TYPE PHONE NUMBER | COMMENTS |
|--|--|
| Property Record file review Assessor's Office 100 McMorran Boulevard Port Huron, Michigan 48060 810-984-9742 | The research indicates that the current structure was constructed in phases between 1966 and 1981. According to the field sheet, the southern ½ of the south ½ of the main eastern shop area (19,348 SF) and office was constructed in 1966 and the northern ½ of the south ½ of the main eastern shop area (14,510 SF) was constructed in 1967. The north ½ of the main eastern shop area (34,668 SF) was constructed in 1971. The western addition (17,160 SF) to the north ½ of the main eastern shop area was constructed in 1972. The far western 'L'-shaped addition (13,201 SF) to the north ½ of the main eastern shop area was constructed in 1981. The connector structure to the 2655 16 th Street facility and eastern addition to the southern ½ of the south ½ of the main eastern shop area were constructed in 1990. No files were available for previous structures on the Site. |

Nova obtained the plat map from this department.

The address of the Site is 1721 Dove Street, Port Huron, St. Clair, Michigan, 48060. The Site is located in an industrial and manufacturing area of St. Clair County. According to the Port Huron Assessor, the assessor's parcel number (APN) of the Site is 74-06-182-0045-000.

According to the review of the Michigan Department of Environmental Quality (MDEQ) -Remediation and Redevelopment Division Part 201 Perfected Enforcement Liens List available via the MDEQ Internet Website indicated that no record of Part 201 Perfected Liens for the Site or the adjacent properties.

Port Huron Fire Department 3.5.4

| CONTACT NAME SOURCE TYPE PHONE NUMBER | COMMENTS |
|---|--|
| FOIA Request Fire Department Administrative Office 100 McMorran Boulevard Port Huron, Michigan 48060 810-984-9750 | Nova made a written Freedom of Information Act (FOIA) request for records from the Port Huron Fire Department for the Site. Files received from the fire department indicated the Site contained the USTs that were removed in 1988 and 1992 listed by the MDEQ with no other information provided. Additionally, the Fire Department indicated that the Site used several different hazardous materials including solvents, flammable liquids, and flammable gases. There was no release of these chemicals reported. |

Michigan Department of Environmental Quality 3.5.5

| INTERNET SOURCE TYPE | COMMENTS |
|--|---|
| MDEQ – Brownfields-USTfields Database | No record of state-nominated and state-funded cleanup listings or indication that a property has been redeveloped using the Baseline Environmental Assessment process for the Site. |



| INTERNET SOURCE TYPE | COMMENTS |
|--|--|
| MDEQ – Storage Tank Information Database (SID) | Record of Underground Storage Tanks regulated under Part 211 as well as Leaking Underground Storage Tank sites for the Site was listed on this database — St Clair Metal Products is listed as having 5 USTs removed from the ground and the release ID # C-0288-89 closed via a Tier I Evaluation on 9/24/04. |
| MDEQ – Part 201 Site List | No record of parcels that are or include a "facility" as defined by Part 201, where there has been a release of a hazardous substance(s) in excess of the Part 201 residential criteria, and/or where corrective actions have not been completed under Part 201 to meet the applicable cleanup criteria for unrestricted residential use for the Site. The site is listed as a Part 201 Site with the following information listed: Site ID: 74000084 Site Name: HURON ST. CLAIR INC Site Address: 1721 DOVE ST City: PORT HURON Zip Code: 48060 County: Saint Clair Source: Miscellaneous Metal Work Pollutant(s): N/A Score: 26 out of 48 Score Date: 2004-08-06 Township: N/A Range: N/A Section: N/A Quarter: N/A Quarter/Quarter: N/A Status: Inactive - no actions taken to address contamination This information matches the EDR database discussed in Section 5.2 As previously stated, Greg Barrows of the RRD has indicated to Nova that the file for the Site cannot be located in the MDEQ system. |
| MDEQ – Remediation and Redevelopment Division's Significant or Resolved Enforcement Actions Table | No record of enforcement actions for the Remediation and Redevelopment Division (RRD) in which there is an on-going civil litigation or the action has been resolved through execution of legally enforceable settlement agreement, court order, or order of the Director of the Department of Environmental Quality for the Site or the adjacent properties. |
| MDEQ – Michigan Environmental Mapper | Nova reviewed the interactive Mapper and the Site was listed as a Closed UST and LUST site and also listed as a Part 201 site. This information matches the EDR database discussed in Section 5.2. Despite this indication, Mr. Greg Barrows of the RRD has indicated to Nova that the file for the Site cannot be located in the MDEQ system. |

3.6 Interviews

The Site contacts did not provide current or past owners, past operators, or past tenants for interview.

Reasonably ascertainable information from current and/or past Site, and/or tenants of the Site provided no evidence indicative of known or suspect environmental concerns associated with the Site. Information from these interviews appears in various sections of this report depending upon the nature of the information.



Previous Reports and Proceedings 3.7

Mr. Brooks Gordon, designated Site contact, reported no knowledge of any pending, threatened, or past litigation, administrative proceedings, notices of violations, environmental liens, or activity and use limitations concerning the Site relating to hazardous substances or petroleum products.

According to information available to Nova and the Client, previous environmental investigations were conducted for the Site. The following is a summary of the reports reviewed.

Phase I Environmental Site Assessment, Advanced Accessory Systems, EMG, October 4, 2004: The assessment identified recognized environmental conditions as well as asbestos containing materials. The report included the following findings, conclusions, and recommendations:

- Presumed ACMs were identified and implementation of an Operations & Maintenance (0&M) Plan was recommended and an 0&M Plan, carrying the same issue date as the ESA, was prepared and appended to the Phase I ESA Report. The ESA did not identify any sampling-confirmed ACM; rather, typical suspect materials were identified.
- The adjacent site to the east at 1630 Dove Street was identified as a BEA and LUST facility and EMG indicated that although groundwater had the potential to affect the Site, because of the inferred groundwater flow, no adverse health effects to Site occupants was anticipated and no further investigation was necessary.
- The Site was an active LUST site that resulted in volatile organic compound (VOC) contamination was present above 'regulatory standards' in soil and groundwater', and previous investigations had been conducted and contaminant levels were decreasing. Review of a previous report indicated that closure would be requested from the MDEQ along with institutional controls that included restricting use of groundwater at the site. EMG recommended regulatory file review to determine LUST regulatory status.

A copy of the report is included in Appendix F.

Chain of Title Search and Judicial Records Review 3.8

Nova was not provided a chain of title by the Client for review as part of this Environmental Site Assessment. Nova was not requested to review judicial records as part of this Environmental Site Assessment.

Lien Review 3.9

EDR was retained to provide a review of any outstanding or recent environmental liens on the Site. No environmental liens or activity/use limitations were found for the Site in the EDR Environmental LienSearch Report dated July 15, 2009.



4.0 SITE RECONNAISSANCE

Mark Napolitan of Nova conducted a reconnaissance of the Site on July 20, 2009 to identify potential recognized environmental conditions in connection with the Site. A diagram of the Site is attached as Figure 2. Selected photographs taken during the Site reconnaissance are included as Appendix D.

The Site includes approximately 5.51 acres improved with a one-story, 105,773 gross square foot industrial building with attached offices of slab-on-grade and steel-framed construction. Additional Site improvements include paved parking, drives, and service areas, landscaping, and loading docks. The Site is not currently developed with underground storage tanks (USTs), wells, wastewater treatment systems, or a septic system, but does contain two small aboveground storage tanks (ASTs). Heating and cooling in office areas is provided by combination heat pumps and split systems, and shop areas are heated by ceiling-mounted unit heaters and are ventilated with fans.

Paved parking and drive areas bound the north and west sides of the Site building. Landscaping surrounds the remainder. The Site improvements were constructed between 1966 and 1981. The building is currently vacant and was previously occupied by Advanced Accessory Systems that was an original equipment manufacturer (OEM) parts provider to the automotive industry. According to historical review, the following activities were conducted on the Site:

- The building was previously used for fabrication of metal roof rack systems, warehousing of raw materials for roof rack system fabrication, and office areas. The following activities were associated with the manufacturing activities:
 - Hazardous waste generation notification under RCRA;
 - NPDES wastewater permit for operations discharging wastewater containing oil associated with exterior ASTs;
 - Operation and removal of five (5) underground storage tanks (USTs);
 - Investigation of groundwater contamination associated with operation of USTs.
- Currently, the Site is vacant as Advanced Accessory Systems is no longer in business, and manufacturing equipment has recently been removed from the Site by a rigging contractor as part of sale of assets.

4.1 Site Access and Limitations

Mr. Brooks Gordon, designated Site Contact, provided access to the Site by the way of keys. Nova was unaccompanied during the Site visit. Nova accessed all interior areas at the Site. Nova also observed all exterior areas and property boundaries. Weather conditions at the time of the reconnaissance were partly cloudy with a temperature of approximately 80 degrees Fahrenheit.



4.2 Current Operations/Tenants

Advanced Accessory Systems was previously the sole occupant/tenant of the Site and currently the Site building is vacant. No current manufacturing operations indicative of known or suspect environmental concern were noted during Nova's reconnaissance. The Site reconnaissance revealed, primarily by the network of groundwater monitoring wells, evidence of significant past leaks or spills or improper use, storage, or generation of hazardous materials expected to have resulted in the potential of current impacts to the Site or may result in regulatory issues associated with hazardous and regulated waste storage and disposal, as discussed later in this section.

4.3 On Site Characteristics

Nova observed no evidence of surface water features including wetlands, lagoons, impoundments, pits, ponds, drywells, creeks, pools of liquids, or other bodies of water on the Site. No evidence of sumps, floor drains, septic tanks, leach fields, grease traps, sand traps, or catch basins, other than used for storm water removal, was observed or reported during the Site reconnaissance. Nova observed no evidence of distressed vegetation, staining or corrosion, dumping of hazardous materials, filled areas, or patched pavement, other than typical parking lot repairs/repaving, on the Site.

4.4 Utilities / Building Systems

The following utilities are provided to the Site:

| UTILITY SERVICE | PROVIDER | | |
|-------------------------|--------------------|--|--|
| Potable water and sewer | City of Port Huron | | |
| Natural gas | SEMCO | | |
| Electricity | DTE Energy | | |
| Propane | Not provided | | |

No evidence of potable drinking water wells, sumps, lift stations, or septic systems was observed on the Site. According to the most recent groundwater quality report issued by the City of Port Huron, the drinking water supply at the Site is in compliance with the EPA's drinking water quality standards. Nova noted no strong, pungent, or noxious odors during the Site visit. No evidence of fueling facilities was observed on the Site.

Approximately 11 groundwater monitoring wells were observed on the southern portion of the Site, south of the building in an unsecured area outside of the fence line. These monitoring wells are associated with the former investigation of the leaking USTs that are discussed in Section 5.2. It should be determined through sampling and discussion with the MDEQ whether all or a portion of these wells are need to comply with any future requirements associated with the investigation remedy. If not, these monitoring wells should be abandoned by a licensed well driller to prevent any potential introduction of hazardous materials to the subsurface by vandalism or accidental release. In the interim, these wells should be evaluated to ensure that the well caps are locked.



4.5 Chemical Use and Storage

Chemical storage and/or hazardous materials identified by visual observation of the Site are listed below:

| CHEMICAL STORAGE | | | | | |
|--|---------------------------|---|---------------------------------|--|--|
| Type of Material | Approximate Quantities | Storage Location | Use | | |
| Off-specification drums, containers, and totes | Various (See Section 4.6) | Northwest Shop Area (See Site Plan Figure) | Former Production & Maintenance | | |
| ASTs | See Section 4.6 & 4.8 | Oil Shed (NW) (See Site Plan Figure) | Former Waste Treatment | | |
| Waste Oil Pump Tank | See Section 4.6 & 4.8 | Northwest Shop Area near Oil Shed (NW) (See Site Plan Figure) | Former Waste Treatment | | |

No indications of spills, leaks, overflows, or potential routes of entry to the subsurface were observed in association with the storage of these materials, except there is an area of concrete floor containing a mixture of water, soluble oil and non-soluble oil next to the area of drum accumulation in the northwest portion of the shop area (See Site Plan Figure). The material on the floor area near the drums should be removed and the area cleaned and inspected to determine if there are any routes where the material may have migrated to the subsurface. The material removed from the floor area and cleaning residue should be adequately characterized and disposed in accordance to RCRA and Michigan waste regulations. The specific composition of the waste oil products identified on the Site were not available.

The use and storage of these materials appears to comply with local, state, and federal requirements, except for waste disposal regulations discussed in Section 4.6.

4.6 Waste Generation / Storage / Disposal

Waste generation, storage, and disposal practices identified by visual observation of the Site are listed below:

| | WASTE GENERATION, | STORAGE, AND DISPOSAL | | |
|--------------------------------------|---|--|--|--|
| Type of Material | Source | Storage Location | Disposal Contracted waste hauler | |
| General municipal & demolition waste | Site operation cessation | Northwest service area: 20 CY Dumpster | | |
| Sanitary wastes | Site operations | N/A | Sanitary sewer system | |
| Wastewater ASTs | Former Wastewater Treatment Operations | Oil Shed (NW) (See Site Plan Figure): ~2,500-gallon ASTs | Michigan Industrial Liquid Waste (019L or 021L) | |
| Waste Oil Pump Tank | Former Wastewater Treatment Operations | Northwest Shop Area near Oil Shed (NW) (See Site Plan Figure): ~50-gallon AST | Michigan Industrial Liquid Waste (019L or 021L) | |



| WASTE GENERATION, STORAGE, AND DISPOSAL | | | | | |
|---|----------------------------------|--|--|--|--|
| Type of Material | Source | Storage Location | Disposal | | |
| Off-specification Materials | Hydraulic fluid and oils | Oil Shed (NW) (See Site Plan Figure): 4 x 55-gallon drums | Michigan Industrial Liquid Waste (019L or 021L) | | |
| Off-specification Materials | Hydraulic fluid and coolant oils | Northwest Shop Area (See Site Plan Figure): 2 x 500-gallon totes | Michigan Industrial Liquid Waste (019L or 021L) | | |
| Off-specification Materials | Hydraulic fluid and oils | Northwest Shop Area (See Site Plan Figure): 25 x 55-gallon drums | Michigan Industrial Liquid Waste (019L or 021L) | | |
| Off-specification Materials | Unknown Dry Powder | Northwest Shop Area (See Site Plan Figure): 6 x 55-gallon drums | Unknown – characterization required | | |
| Off-specification Materials | Unknown Grease | Northwest Shop Area (See Site Plan Figure): 1 x 55-gallon drums | Unknown – characterization required | | |
| Off-specification Materials | Unknown | Northwest Shop Area (See Site Plan Figure): 2 x pallets containing 1 & 5- gallon containers | Unknown – characterization required | | |
| Off-specification Materials | Unknown | Northwest Shop Area (See Site Plan Figure): 1 x 55-gallon drums | Unknown – characterization required | | |

There were several off-specification and/or waste drums, totes, storage tanks, and smaller containers located within the shop area that remain in the facility after cessation of operations that should be adequately characterized and disposed as RCRA Hazardous or Michigan Industrial wastes. The waste materials need to be properly profiled and submitted to appropriate waste disposal facilities for approval and ultimate disposal. Additionally, these drums should be properly labeled and disposed in accordance with RCRA regulations in regards to length of accumulation. The specific composition of the waste oil products identified on the Site were not available.

Nova observed no indications of spills, leaks, overflows, or potential routes of entry to the subsurface in association with these materials, except where discussed in Section 4.5 and 4.8.

4.7 Potential PCB-Containing Equipment

Potential PCB-containing equipment identified by visual observation of the Site is listed below:



| POLYCHLORINATED BIPHENYLS (PCBS) | | | | | | | |
|----------------------------------|----------|------|---|-------------------|---------------------|--|--|
| Equipment Type | | | Location | Observed Leak? | PCB- Containing? | | |
| Pad-mounted transformer | One | Site | Site exterior (See Site Plan Figure) | No | Potentially | | |
| Waste compactor | One | Site | Inside west end of building | No | Potentially | | |
| Dock levelers | Three | Site | Inside west end of building | No | Potentially | | |
| Light ballasts | Numerous | Site | Parking areas; Site building | No | Likely | | |

One pad-mounted transformer, owned by Site, was observed along the southeast corner of the structure of the Site. Based on the absence of tags and previous report findings, the transformer is owned by the Site, and based on the lack of files for review, there is no information regarding PCBs-status. Based on the construction date of the building (1966), the transformers may be PCB-containing. No leaks or staining were observed on or surrounding the transformer.

Multiple Site-owned light ballasts were observed in the Site building and parking areas. Based on the construction date of the building (1966), these light ballasts may be PCB-containing. The light ballasts were observed to be in good condition, with no evidence of leaks or fires observed.

One waste dumpster compactor motor and three dock levelers were observed in the Site building. No evidence of releases of hydraulic fluids were observed around the visible portions of this equipment.

No other evidence of electrical transformers or past or present vertical lifts, bailers or compactors that could contain PCB was observed at the Site.

4.8 Storage Tanks / Drums

No evidence of underground storage tanks, such as fill pipes/ports or vent pipes, were observed on the Site; however, two approximately 2,500-gallon aboveground storage tanks (ASTs) that were used in former operations to contain wastewater and oil from metal fabrication operations was observed on the west side of the building in the adjacent shed structure. Regulatory and municipal information identified evidence of storage tanks at the Site. Five USTs were formerly operated when the Site was operated by St. Clair Metal Products; these USTs have been removed; however, a release was reported at the time of removal. Further information is presented in Section 5.2.

No unlabeled containers or drums were observed during the Site reconnaissance.

Site observations and investigations identified the following storage tanks at the Site.



| | | STORAGE TANK(S) | | | |
|---------------|------------------------------|--|--|--|--|
| Size | Type (UST or AST) | Location | Material Stored | Installation / Closure Date Unknown / Active | |
| 50-gallon | AST - Waste Oil Pump Tank | Northwest Shop near Shed Structure (See Site Plan Figure) | Oil | | |
| ~2,500-gallon | AST | Northwest Shed Structure (See Site Plan Figure) | Oil & wastewater | Unknown / Active | |
| ~2,500-gallon | AST | Northwest Shed Structure (See Site Plan Figure) | Oil & wastewater | Unknown / Active | |
| 16,000-gallon | UST | Southeast corner of the shop area (See | Diesel | 1978 / 1984 | |
| 1,200-gallon | UST | Site Plan Figure) | Reported as toluene or methyl ethyl ketone) | 1975 / 1978 | |
| 1,200-gallon | UST | | Reported as toluene or methyl ethyl ketone) | 1975 / 1978 | |
| 1,000-gallon | UST | | Reported as toluene or methyl ethyl ketone) | 1984 / 1988 | |
| 1,100-gallon | UST | | Waste Process Water (constituents or source not identified) | 1985 / 1986 | |

The concrete containment surrounding the oil and wastewater tanks was observed to contain oil and water as well as the concrete floor outside of the containment area. Additionally, the tanks may still contain waste materials that will require proper disposal. The material on the floor areas and within the containment should be removed and the areas cleaned and inspected to determine if there are any routes where these materials may have migrated to the subsurface. The material contained in the ASTs should be removed and disposed, along with the materials removed from the floor and containment area, in accordance to RCRA and Michigan waste regulations.

The five (5) former USTs were removed from the ground and reported to have leaked and an investigations were conducted that are further discussed in Section 5.2. A portion of a closure report (text only) for at least two of the tanks was reviewed by Nova during the preparation of this report. The closure report was prepared by Conestoga-Rovers Associates and dated September 2004. The report references two toluene tanks removed from the property and subsequent sampling activities. While specific soil and groundwater detections were not included in the portion of the report available to Nova, the report did indicate that some detection of tetrachloroethylene, vinyl chloride and select metals were identified in groundwater above Tier 1 Residential Drinking Water RBSLs. A letter acknowledging the removal and requested closure of the tank release case was issued by the MDEQ on October 21, 2004 and outlines the Restrictive Covenant in place at the Site.

4.9 Asbestos-Containing Building Materials (ACBM)

Historically suspect asbestos-containing building materials noted during the Site visit included insulation, ceiling tile, drywall assemblies, flooring, and roofing materials. The



roof was not observed during Nova's reconnaissance. Prior to demolition or renovation activities, previously untested suspect asbestos-containing materials, if identified, that are likely to be impacted should be sampled by a licensed asbestos inspector and analyzed by an accredited laboratory.

Nova collected and analyzed 27 samples of the above-mentioned potential ACBMs during the Site reconnaissance. Those samples identified as asbestos-containing as well as their locations are included in the summary table below. Nova's asbestos analytical results and chain of custody forms are included as Appendix F.

| Sample ID | Component | Location | Asbestos Percentage | Condition |
|-----------|-------------------------------------|--|------------------------|-----------|
| VT-1 | 12" x 12" vinyl tile – yellow / tan | Office | NAD | Fair |
| VT-1B | Mastic for VT-1 | Office | NAD | Good |
| VT-2 | 12" x 12" vinyl tile – beige | Office (beneath VT-1) | NAD | Fair |
| VT-2B | Mastic for VT-2 | Office (beneath VT-1) | NAD | Good |
| M-1 | Mauve Carpet mastic | Office | NAD | Good |
| JC-1 | Drywall joint compound | Office | NAD | Good |
| L-1 | Sheet linoleum – black | Office - women's restroom | NAD | Good |
| CMM-1 | Brown Cove molding mastic | Office | NAD | Good |
| VT-3 | 12" x 12" vinyl tile – yellow | Office – men's restroom | NAD | Fair |
| VT-3B | Mastic for VT-3 | Office – men's restroom | NAD | Good |
| ACCT-1 | Suspended acoustical ceiling panel | Office – men's restroom | NAD | Fair |
| VT-4 | 12" x 12" vinyl tile – beige | South Shop Office | NAD | Fair |
| VT-4B | Mastic for VT-4 | South Shop Office | NAD | Good |
| VT-5 | 12" x 12" vinyl tile – beige | Lunch room | NAD | Fair |
| VT-5B | Mastic for VT-5 | Lunch room | NAD | Good |
| VT-6 | 12" x 12" vinyl tile – gray | Men's restroom – column E4 | NAD | Fair |
| VT-6B | Mastic for VT-6 | Men's restroom – column E4 | NAD | Good |
| ACCT-2 | 12" x 12" acoustical ceiling tile | Shop Production Office | NAD | Good |
| 1-1 | FG Pipe insulation joint tape | Shop Area – throughout | NAD | Fair |
| VT-7 | 12" x 12" vinyl tile – beige | Women's restroom – mezzanine | NAD | Fair |
| VT-7B | Mastic for VT-7 | Women's restroom – mezzanine | NAD | Good |
| VT-8 | 12" x 12" vinyl tile – beige | Women's restroom – mezzanine (beneath VT-7) | <1% chrysotile | Fair |
| VT-8B | Mastic for VT-8 | Women's restroom – mezzanine (beneath VT-7) | NAD | Good |
| 1-2 | FG Pipe insulation joint tape | Shop Area – waste oil boiler piping | NAD | Fair |
| IC-2 | Drywall joint compound | South Shop Office | NAD | Good |
| VT-9 | 12" x 12" vinyl tile – beige | Office lobby | NAD | Fair |
| VT-9B | Mastic for VT-9 | Office lobby | NAD | Good |

NAD = No asbestos detected.

The previous Phase I ESA report discussed in Section 3.7 contained an Operations & Maintenance (O&M) Plan that was prepared based on limited ACBM sampling conducted



during the previous Phase I ESA. No ACBM was confirmed during sampling performed as part of EMG's 2004 ESA.

Prior to any renovation or demolition activities, suspect ACBMs that may be impacted by these activities should be sampled and analyzed for asbestos content by a licensed asbestos inspector. Suspect ACBMs at the Site that become damaged, or may be affected by renovation or demolition activities should be isolated, encapsulated, and/or abated by a licensed asbestos abatement contractor.

4.10 Lead Based Paint

Due to the date of construction (1966-1981), lead-based paint may be present. However, since the current regulations regarding lead-based paint are generally for residential properties, lead-based paint is not considered a significant environmental concern. The permanent building at the Site is non-residential in use. All painted surfaces were observed to be in fair to poor condition with significant signs of peeling and flaking.

4.11 Lead In Drinking Water

A limited lead in drinking water assessment was performed to gather quantitative information from representative water sources at the Site. No evidence of potable drinking water wells was observed on the Site. Potable water at the Site is provided through the Port Huron. According to the USEPA Safe Drinking Water Information System Internet site, the city's water system is within state and federal drinking water standards. The USEPA action level for lead in drinking water is 15 micrograms per liter (μ g/L).

Nova sampled three water sources in the building for lead content. The drinking water was sampled by filling one sample container with an initial draw of the faucet and a second draw sample was obtained after a thirty-second flush. The initial draw samples were analyzed for the presence of lead and the thirty-second flush samples were placed on hold pending the results of the initial draw samples. The analytical results and chain of custody forms are included as Appendix F. The results are as follows:

| DRINKING WATER SAMPLES | | | | | | |
|---|------------------|----------------|--|--|--|--|
| Location | Sample Number | Results (µg/L) | | | | |
| Drinking fountain outside office in Shop (initial draw) | 1-00 | <3.0 | | | | |
| Drinking fountain outside office in Shop (30-second draw) | 1-30 | Not analyzed | | | | |
| Women's restroom sink – Office (initial draw) | 2-00 | 12 | | | | |
| Women's restroom sink – Office (30-second draw) | 2-30 | Not analyzed | | | | |
| Women's restroom sink – near lunch room (initial draw) | 3-00 | <3.0 | | | | |
| Women's restroom sink – near lunch room (30-second draw) | 3-30 | Not analyzed | | | | |

ND - Not detected at or above adjusted reporting limit

Based upon the results of the limited drinking water screening, the presence of lead in this facility was either not detected at laboratory detection levels or is below the 15 μ g/L



USEPA action level for lead in drinking water. Based on this limited sampling, no additional action is warranted.

4.12 Radon

According to a current USEPA map of Radon Zones, the Site is located in Zone 3 of the USEPA's radon designation categories. Zone 3 indicates that the expected radon concentration of the Site is less than 2.0 picoCuries per Liter (pCi/L) of air. The USEPA action level for radon is 4.0 pCi/L.

Nova conducted two (2) tests for the presence of radon in accordance with the United States Environmental Protection Agency's protocols for radon screening. Laboratory analytical results are attached as Appendix F.

The short-term radon screening did not identify radon concentrations above the EPA's recommended Action Level of 4.0 picoCuries per liter (pCi/L) of air in samples collected at the Site as part of the scope of this assessment.

Test results are summarized below.

| RADON SCREENING RESULTS | | | | | | |
|-------------------------|--------------------------------|--------------------------------|--|--|--|--|
| Location | Radon Concentration (pCi/L) | Sample Collection Dates | | | | |
| Offices | 1.4 | July 20, 2009 to July 22, 2009 | | | | |
| Shop Area | 1.3 | July 20, 2009 to July 22, 2009 | | | | |

Based on these results and the non-residential use of the Site, radon is not considered a concern and no further investigation is warranted.

4.13 Mold

No evidence of significant water infiltration or visible mold growth was observed within the occupied areas of the building during Nova's limited visual observation of the Site interior. Observations for mold growth were not intended to represent a comprehensive mold inspection.

4.14 Electromagnetic Field (EMF)

No evidence of high-tension high-voltage power lines, microwave towers or antennas were observed on or adjacent to the Site. The EDR environmental database report did not identify the presence of power lines within the vicinity of the Site.

4.15 Urea Formaldehyde

Urea formaldehyde foam insulation was not reported or detected at the Site during the Site reconnaissance.



4.16 Dry Cleaners and/or Laundry Facilities

No laundry or dry cleaning facilities were present at the Site at the time of our visit. Historical and regulatory information reviewed identified no dry cleaning or laundering facilities on the Site.

4.17 Potential Additional Unidentified Site Concerns

No potential additional unidentified Site concerns were identified as a result of this ESA.

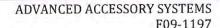
4.18 Surrounding Property Observations

General observations of properties adjoining the Site were conducted in conjunction with on-Site observations made July 20, 2009 during Nova's Site reconnaissance and are summarized below.

| SURROUNDING PROPERTY OBSERVATIONS | | | | | |
|-----------------------------------|---|--------------------------------|--|--|--|
| Direction | Use | Observed Chemical Use/Storage? | | | |
| North | Vacant lot east of the DHL warehouse structure at 2654 20 th Street to the northwest and Advanced Accessory Systems at 2655 16 th Street to the northeast | No | | | |
| East | Vacant Crown Group facility at 1631 Dove Street | No | | | |
| South | Pro Weld facility at 1720 Dove Street to the east and Earl Smith Distributors at 1730 Dove Street to the west | No | | | |
| West | Norman G Jensen Warehouse facility at 1915 Dove Street | No | | | |

Observations of adjacent properties did not reveal any obvious visual evidence of environmental concerns. None of the facilities is listed on regulatory databases indicative of known or suspected environmental concerns likely to have impacted the Site subsurface, except for the facilities to the south were listed on the environmental database report as discussed in further detail in Section 5.0. The facilities are as follows:

- Huron St. Clair at 2655 16th Street was identified as a RCRA-NonGEN and FINDS site.
- The Crown Group at 1631 Dove Street was identified as a RCRIS-LQG facility. Riverside Metal Products at 1631 Dove Street was listed as having the USTs. However, based on the downgradient location relative to the Site, this facility is unlikely to have affected conditions at the Site.
- The Earl C. Smith and Earl Smith Distributing listings (presumed to be former tenants at 1720 and 1730 Dove Street) were identified as closed LUST facilities. However, based on the downgradient location relative to the Site, the current regulatory status, these facilities are unlikely to have affected conditions at the Site.





5.0 REGULATORY REVIEW

Nova reviewed regulatory agency database information compiled by Environmental Data Resources, Inc. (EDR) to help identify recognized environmental conditions in connection with the Site. Unless stated otherwise in this section, the scope of Nova's review is limited to review of the information provided by EDR, and does not include review of regulatory agency files pertaining to specific sites that may have been identified. The regulatory review incorporates the Approximate Minimum Search Distances (AMSDs) as set forth by ASTM plus any additional Client-specific required search distances that may exceed the AMSDs or as deemed applicable by Nova.

The EDR report includes an Orphan list of facilities that could not be precisely located due to inadequate address information. Nova reviewed this list and determined where these facilities are located relative to the Site. *None of the Orphan listings are located on the Site.* The information was incorporated into the discussion of the appropriate database. Additionally, Nova's field survey verifies the locations of EDR-identified facilities in relation to the Site, and, if necessary, adjusts their distances and directions with respect to their actual locations.

The results of the review for each database are discussed below. Databases with listings identified on or in the area of the Site are discussed separately, outside of the table. The locations for the facilities discussed in this section are shown on the figures in the EDR report, included as Appendix G. A detailed description of each regulatory database searched is included in the EDR Report.

5.1 Federal Agency, Tribal and EDR Proprietary Records Review

| DATABASE SEARCHED? | Distance Searched | Site Listings? | Adjacent Listings? | Listings w/in 0.25-Mile? | Listings w/in 0.25-0.50-Mile? | Listings w/in 0.5-1.0 Mile? |
|-----------------------|----------------------|-------------------|-----------------------|--------------------------|----------------------------------|-----------------------------|
| NPL | 1.0 Mile | No | No | No | No | No |
| Proposed NPL | 1.0 Mile | No | No | No | No | No |
| Delisted NPL | 1.0 Mile | No | No | No | No | No |
| NPL Liens | Target Property | No | N/A | N/A | N/A | N/A |
| CERCLIS | 0.5 Mile | No | No | No | No | N/A |
| CERCLIS-NFRAP | 0.25 Mile | No | No | No | N/A | N/A |
| CORRACTS | 1.0 Mile | No | No | No | No | Yes |
| RCRIS-TSD | 0.5 Mile | No | No | No | No | N/A |
| RCRIS-LQG | 0.25 Mile | No | Yes | No | N/A | N/A |
| RCRIS-SQG | 0.25 Mile | No | No | Yes | N/A | N/A |
| RCRIS-CESQG | 0.25 Mile | Yes | No | Yes | N/A | N/A |
| RCRIS-NonGen | 0.25 Mile | Yes | No | No | N/A | N/A |
| ERNS | Target Property | No | N/A | N/A | N/A | N/A |
| HMIRS | Target Property | No | N/A | N/A | N/A | N/A |
| SPILLS | Target Property | No | N/A | N/A | N/A | N/A |



| DATABASE SEARCHED? | Distance Searched | Site Listings? | Adjacent Listings? | Listings w/in 0.25-Mile? | Listings w/in 0.25-0.50-Mile? | Listings w/in 0.5-1.0 Mile? |
|-----------------------|----------------------|-------------------|-----------------------|-----------------------------|----------------------------------|--------------------------------|
| US ENG CONTROLS | 0.5 Mile | No | No | No | No | No |
| US INST CONTROLS | 0.5 Mile | No | No | No | No | No |
| DOD | 0.25 Mile | No | No | No | N/A | N/A |
| FUDS | 1.0 Mile | No | No | No | No | No |
| US Brownfields | 0.5 Mile | No | No | No | No | N/A |
| CONSENT | 1.0 Mile | No | No | No | No | No |
| ROD | 1.0 Mile | No | No | No | No | No |
| UMTRA | 0.5 Mile | No | No | No | No | N/A |
| TRIS | Target Property | No | N/A | N/A | N/A | N/A |
| TSCA | Target Property | No | N/A | N/A | N/A | N/A |
| FTTS | Target Property | No | N/A | N/A | N/A | N/A |
| SSTS | Target Property | No | N/A | N/A | N/A | N/A |
| MLTS | Target Property | No | N/A | N/A | N/A | N/A |
| MINES | 0.25 Miles | No | No | No | N/A | N/A |
| FINDS | Target Property | No | Yes | N/A | N/A | N/A |
| RAATS | Target Property | No | N/A | N/A | N/A | N/A |

The Site was identified on federal databases.

The Site was listed as a RCRIS-CESQG facility. This listing, Sportrack Automotive at 1721 Dove Street, is listed on the RCRIS-CESQG database that identifies the Site as a Conditionally Exempt Small Quantity Generator, a business that typically generates less than 100 kilograms of hazardous waste in a calendar month. The Site was also listed as not having violations found. As such, while this regulatory status by itself is not necessarily indicative of subsurface contamination, the overall use of the Site for industrial/manufacturing purposes from approximately 1968 through approximately 2008 (during which Sportrack Automotive was a tenant) is considered cause for cumulative concern related to general subsurface environmental conditions and justification for additional subsurface investigation as prescribed herein.

One CORRACTS facility was identified within a one-mile radius of the Site. This facility, Prestolite Wire Corp. Port Huron at 3529 24th Street, is located approximately 0.748-mile south-southwest of the Site. Based on review of the USGS Topographic Map, this facility is located topographically down to cross-gradient from the Site, as estimated groundwater flow in the area of the Site is to the southeast and away from the Site. Based on its distance from the Site, topographic relations, and estimated groundwater flow, this facility is unlikely to have affected subsurface conditions at the Site.

One RCRIS-LQG facility was identified adjacent to the Site. This facility, The Crown Group at 1631 Dove Street, is located adjacent east (downgradient) from the Site. The RCRIS-LQG database that identifies the facility as a Large Quantity Generator, a business that typically generates more than 1,000 kilograms of hazardous waste in a calendar month. Based on topographic location relative to the Site, lack of other listings associated with releases of



hazardous materials or hazardous waste, this facility is unlikely to have affected subsurface conditions at the Site.

One RCRA-NonGEN and FINDS facility was identified within a one-mile radius of the Site. The facility, Huron St. Clair at 2655 16th Street, was identified as a RCRA-NonGEN and FINDS site. The FINDS listing indicates that the facility is listed with Registry Number 110001844933 that is a pointer to other database source that contain more detailed information that includes the TRIS that is the Toxic Release Inventory System that tracks toxic chemicals at facilities and RCRAInfo that is a national inventory system that allows RCRA Program to track facilities that generate hazardous waste. The RCRA-NonGEN listing indicates that the facility is a handler, but not a generator, of hazardous waste. The facility was also listed as not having violations found; therefore, based on the regulatory status, this listing is unlikely to have affected subsurface conditions at the Site.

5.2 State Agency Record Review

| DATABASE SEARCHED? | Distance Searched | Site Listings? | Adjacent Listings? | Listings W/In 0.25-Mile? | Listings W/In 0.25-0.50-Mile? | Listings W/In 0.5-1.0 Mile? |
|------------------------------|----------------------|-------------------|-----------------------|--------------------------|-------------------------------|-----------------------------|
| State Hazardous Waste (SHWS) | 1.0 Mile | Yes | No | No | No | Yes |
| State Landfill (SWF/LF) | 0.5 Mile | No | No | No | No | N/A |
| LUST | 0.5 Mile | Yes | Yes | Yes | No | N/A |
| Indian LUST | 0.5 Mile | No | No | No | No | N/A |
| UST | 0.25 Mile | Yes | Yes | Yes | N/A | N/A |
| Indian UST | 0.25 Mile | No | No | No | N/A | N/A |
| AST | 0.25 Mile | No | No | Yes | N/A | N/A |
| AUL | 0.5 Mile | No | No | No | No | N/A |
| NPDES | Target Property | Yes | N/A | N/A | N/A | N/A |
| AIRS | Target Property | No | N/A | N/A | N/A | N/A |
| Dry Cleaners | 0.5 Mile | No | No | No | No | N/A |
| Brownfields | 0.5 Mile | No | No | No | No | N/A |
| BEA | 0.5 Mile | Yes | No | No | Yes | N/A |
| Indian Reserv | 1.0 Mile | No | No | No | No | No |
| Coal/Gas | 1.0 Mile | No | No | No | No | No |

The Site was identified on any of the state databases within the specified search radii.

St. Clair Metal Products at 1721 Dove Street, the Site, is listed on the SHWS database. The SHWS database identifies the Site as an inactive hazardous waste site where no actions taken to address contamination. No additional information regarding contaminants of concern or regulatory status in regards to the Part 201 Program were provided. The listing has the potential to have affected subsurface conditions at the Site as well as regulatory compliance issues; therefore, this listing represents a recognized environmental condition. Nova made a FOIA request with the MDEQ to review the Waste Management Division and Remediation and Redevelopment Division (RRD) - Part 201 files regarding the subsurface contaminant concentrations as well as compliance with the Part 201 Program. However,



the RRD responded to indicate that they could not locate the active file for the Site in their system.

St. Clair Metal Products at 1721 Dove Street, the Site, is listed on the LUST database. A portion of a closure report (text only) for at least two of the tanks was reviewed by Nova during the preparation of this report. The closure report was prepared by Conestoga-Rovers Associates and dated September 2004. The report references two toluene tanks removed from the property and subsequent sampling activities. While specific soil and groundwater detections were not included in the portion of the report available to Nova, the report did indicate that some detection of tetrachloroethylene, vinyl chloride and select metals were identified in groundwater above Tier 1 Residential Drinking Water RBSLs.

The LUST database identifies the Site as having the release number C-0288-89 that was closed on October 21, 2004. Although the current database listing indicates that the case has been closed, it does not indicate that contaminants do not still exist in the subsurface. Additionally, the MDEQ Storage Tank Information Database indicates that a Tier I Evaluation was conducted with a Deed Restriction to obtain closure under the Part 213 Program indicating that contaminant levels have exceeded MDEQ Generic Cleanup Criteria. The closure may prohibit certain future unrestricted use of the Site; therefore, although this listing does not represent a regulatory compliance issue, the closure type represents a recognized environmental condition. Nova made a FOIA request with the MDEQ to review the RRD -UST files regarding the subsurface contaminant concentrations as well as any revised deed restrictions under the Part 213 Program. However, the RRD responded to indicate that they could not locate the active file for the Site in their system. A copy of the 2004 version was reviewed and is included in the appendices of this ESA.

The Site, listed as Sportrack Port Huron at 1721 Dove Street, is listed on the Baseline Environmental Assessment (BEA) database. The BEA database identifies the site as having submitted the BEA for this facility in 2004 on behalf of W.P. Carey & Company LLC. The BEA submittal indicates that subsurface contamination existed at this facility above, at a minimum, Generic Residential Cleanup Criteria at the time the BEA was submitted. The listing indicates that there are affected subsurface conditions at the Site.

The BEA was prepared because the land was determined to contain hazardous substances at levels that would deem the Property a 'facility' as defined by Part 201 of NREPA. A 'facility' is any property where hazardous substances were found at levels that exceed relevant Generic Residential Cleanup Criteria. The BEA was submitted as a Category D BEA, which means that different hazardous substances intended to be utilized at the 'facility' than the type of hazardous substances found to contaminate the subsurface.

As stated above, Nova made a FOIA request with the MDEQ to review the RRD – Part 201 files regarding the Site to determine what contaminant levels exist on the Site with regard to the BEA submittal. However, the RRD responded to indicate that they could not locate the active file for the Site in their system.

The Site was listed as a NPDES facility. This facility, Sportrack Automotive at 1721 Dove Street is listed on the NPDES database that identifies the site having a permit to discharge



wastewater under Permit Number MIS410519 that was issued 4/1/04 and expired 4/1/09. There was no other information provided. Although this permit is not indicative of subsurface contamination, proper closure conditions of the permit that was issued by the MDEQ should be determined; therefore, Nova has made a FOIA request with the MDEQ to review the Wastewater Division files regarding the site to determine whether any regulatory issues remain and, if any, actions are needed.

Two SHWS facilities were identified within a one-mile radius of the Site. The Prestolite Wire Corp Port Huron at 3529 24th Street is located approximately 0.748-mile south-southwest of the Site, and Gibraltar Sprocket at 3592 Military Street is located approximately 0.855-mile south-southwest of the Site. The facilities are listed a having Interim Response in progress. Based on review of the USGS Topographic Map, both sites are located topographically down to cross-gradient from the Site and estimated groundwater flow in the area of the Site is to the southeast and away from the Site. Based on their distance from the Site, topographic relations, and estimated groundwater flow, both facilities are unlikely to have affected subsurface conditions at the Site.

Five LUST facilities were identified within ½ -mile radius of the Site and three of these facilities are located adjacent to the Site and are listed as 'closed' status. Each is described below:

Earl C. Smith and Earl Smith Distributing at 1720 and 1730 Dove Street (two facilities), are located adjacent southeast and south of the Site, respectively. The LUST database identifies the sites as having multiple release numbers that were closed in 1991 and 1995. Additionally, the facilities are located topographically down-gradient from the Site; therefore, based on the regulatory status, and estimated groundwater flow, these facilities are unlikely to have affected subsurface conditions at the Site.

Coca-Cola Bottling Company at 1680 Dove Street is located east-southeast of the Site. The LUST database identifies the site as having the release number C-0199-90 that was closed in 1998. Additionally, the facility is located topographically down-gradient from the Site; therefore, based on the regulatory status, and estimated groundwater flow, this facility is unlikely to have affected subsurface conditions at the Site.

Penske Truck Leasing at 1900 Dove Street is located southwest of the Site across Dove Street. The LUST database identifies the facility as having the release number C-0860-93 that was closed in 1995. Additionally, the facility is located topographically cross to down-gradient from the Site; therefore, based on the regulatory status, and estimated groundwater flow, this facility is unlikely to have affected subsurface conditions at the Site.

The last facility, 6.5 Acre Vacant Parcel at 3201 Military, is located 0.381 mile south of the subject and is listed as an open LUST case. However, based on its distance from the Site and estimated regional groundwater flow, this facility is unlikely to have affected subsurface conditions at the Site.



6.0 FINDINGS/CONCLUSIONS/RECOMMENDATIONS

Nova has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-05 of Advanced Accessory Systems, 1721 Dove Street, Port Huron, Michigan. Any exceptions to or deletions from this practice are described in Section 4.1 of this report.

FINDINGS AND CONCLUSIONS

This assessment has revealed evidence of recognized environmental conditions in connection with the Site, including the following:

- Database St. Clair Metal Products at 1721 Dove Street is listed on the SHWS database. The SHWS database identifies the Site as an inactive hazardous waste site where no actions taken to address contamination. No additional information regarding contaminants of concern or regulatory status in regards to the Part 201 Program were provided. The listing has the potential to have affected subsurface conditions at the Site as well as regulatory compliance issues; therefore, this listing represents a recognized environmental condition. Nova has made a FOIA request with the MDEQ to review the Waste Management Division and Remediation and Redevelopment Division (RRD) Part 201 files regarding the subsurface contaminant concentrations as well as compliance with the Part 201 Program. This information was not received in the time frame of this report and is considered not reasonably ascertainable. Additionally, Nova was informed by Mr. Greg Barrows of the RRD that the Part 201 files could not be located with the MDEQ system.
- Database St. Clair Metal Products at 1721 Dove Street is listed on the LUST database. The LUST database identifies the Site as having the release number C-0288-89 that was closed in 2004. Although the database indicates that the case has been closed, it does not indicate that contaminants do not still exist in the subsurface. Additionally, the MDEQ Storage Tank Information Database indicates that a Tier I Evaluation was conducted with a Deed Restriction to obtain closure under the Part 213 Program indicating that contaminant levels have exceeded MDEQ Generic Cleanup Criteria. The closure may prohibit certain future unrestricted use of the property; therefore, although this listing does not represent a regulatory compliance issue, the closure type represents a recognized environmental condition.
- Database A former tenant, Sportrack Port Huron at 1721 Dove Street, is listed on the Baseline Environmental Assessment (BEA) database. The BEA database identifies the Site as having submitted the BEA for this facility in 2004 on behalf of W.P. Carey & Company LLC. The BEA was prepared because the land was determined to contain hazardous substances at levels that would deem the Site a 'facility' as defined by Part 201 of NREPA. A 'facility' is any property where hazardous substances were found at levels that exceed relevant Generic Residential Cleanup Criteria. The BEA was submitted as a Category D BEA, which means that different hazardous substances



intended to be utilized at the 'facility' than the type of hazardous substances found to contaminate the subsurface. Nova has made a FOIA request with the MDEO to review the RRD - Part 201 files regarding the site to determine what contaminant levels exist on the property in regards to the BEA submittal. However, as stated above, the Part 201 files could not be located by RRD staff in the MDEQ system.

In summary, the overall use of the Site for industrial/manufacturing purposes from approximately 1966 through approximately 2000 is considered cause for cumulative concern related to general subsurface environmental conditions and justification for additional subsurface investigation.

Additionally, the following items of environmental concern were noted that warrant mention.

- Wells Approximately 11 groundwater monitoring wells were observed on the southern portion of the Site, south of the building in an unsecured area outside of the fence line. These monitoring wells are associated with the former investigation of the leaking USTs that are discussed in Section 5.2. It should be determined by the MDEQ whether all or a portion of the monitoring wells are needed to comply with any future requirements associated with the investigation remedy. If not, then these monitoring wells should be abandoned by a licensed well driller to prevent any potential introduction of hazardous materials to the subsurface by vandalism or accidental release. In the interim, these wells should be monitored to ensure that the well caps are locked.
- · Waste Evidence of spills, leaks, overflows, or potential routes of entry to the subsurface were observed in association with the area of concrete floor containing a mixture of water, soluble oil and non-soluble oil next to the area of drum accumulation in the northwest portion of the shop area (See Site Plan Figure).
- Waste There were several off-specification and/or waste drums, totes, storage tanks, and smaller containers detailed in Section 4.6 located within the shop area that remain in the facility after cessation of operations that should be disposed as RCRA Hazardous or Michigan Industrial wastes. The waste materials need to be properly profiled and submitted to appropriate waste disposal facilities for approval and ultimate disposal. Additionally, these drums should be properly labeled and disposed in accordance with RCRA regulations in regards to length of accumulation.
- Waste Evidence of spills, leaks, overflows, or potential routes of entry to the subsurface were observed in association with the observed above ground tanks located in the oil house northwest of the facility. The concrete containment surrounding the oil and wastewater tanks was observed to contain oil and water as well as the concrete floor outside of the containment area. Additionally, the tanks may still contain waste materials that will require proper disposal.
- Permitting The Site was listed as a National Pollutant Discharge Elimination System (NPDES) facility. This former tenant, Sportrack Automotive at 1721 Dove Street is

F09-1197



listed on the NPDES database that identifies the Site having a permit to discharge wastewater under Permit Number MIS410519 that was issued 4/1/04 and expired 4/1/09. There was no other information provided. Although this permit does not represent indication of subsurface contamination, proper closure conditions of the permit that was issued by the MDEQ has not been determined.

 Trace amounts of asbestos was identified in a vinyl floor tile on-Site. Additionally, based on the age of the Site building, the building materials may contain asbestos.

RECOMMENDATIONS

Based on the findings of this Phase I Environmental Site Assessment, Nova recommends the following:

- Waste The material on the floor area near the drums should be removed and the area cleaned and inspected to determine if there are any routes where the material may have migrated to the subsurface. The material removed from the floor area and cleaning residue should be disposed in accordance to RCRA and Michigan waste regulations.
- Waste The off-specification chemicals in waste drums, totes, storage tanks, and smaller containers detailed in Section 4.6 are waste materials that need to be properly profiled and submitted to appropriate waste disposal facilities for approval and ultimate disposal. Additionally, these drums should be properly labeled and disposed in accordance with RCRA regulations in regards to length of accumulation.
- Waste The material on the floor areas and within the containment in the oil shed should be removed and the areas cleaned and inspected to determine if there are any routes where these materials may have migrated to the subsurface. The material contained in the ASTs should be removed and disposed, along with the materials removed from the floor and containment area, in accordance to RCRA and Michigan waste regulations.
- Proper closure conditions of the NPDES permit that was issued by the MDEQ should be determined.
- These areas described above, as well as the areas formerly having contained the USTs should be investigated for the potential remaining presence of contaminants in the subsurface. This investigation should include sampling of the existing wells on the south side of the Site.
- Suspect asbestos-containing materials should continue to be managed in-place in good condition under an Asbestos Operations & Maintenance Program. Such a plan was prepared by EMG, Inc., dated October 4, 2004.





7.0 STANDARD OF CARE

The services performed by Nova Consulting Group, Inc. on this project have been conducted with that level of care and skill ordinarily exercised by reputable members of the profession, practicing in the same locality, under similar budget and time constraints. We declare that to the best of our knowledge one or more of the parties involved in the preparation of this report meet the definition of environmental professional as defined in §312.10 of 40 C.F.R. 312 and 12.13.2. One or more of the parties involved in the preparation of this report have the specific qualifications base on education, training, and experience to assess a property of the nature, history, and setting of the Site. We have developed and performed the all appropriate inquiries in conformance with the standards and practices as set forth in 40 C.F.R. Part 312. No other warranty is expressed or intended.

This report is exclusively for the use and benefit of those listed on the title page of this report and may not be relied upon by any other person or entity without written permission from Nova.

PREPARED BY:

NOVA CONSULTING GROUP, INC.

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Vice President



REFERENCES

GEOLOGICAL REFERENCES AND OTHER DOCUMENTS REVIEWED

- American Society for Testing and Materials, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM Designation: E 1527-2005.
- Federal Emergency Management Agency, Federal Insurance Administration, National Flood Insurance Program, Flood Insurance Map, Community Map Number 260204 0005B, December 1, 1978.
- United States Environmental Protection Agency (USEPA) map of sole source aquifers, www.epa.gov/safewater/swp/sumssa.html
- USEPA map of radon zones, www.epa.gov/iaq/radon/zonemap.html
- United States Fish and Wildlife Service Wetlands Geodatabase, wetlandsfws.er.usgs.gov
- United States Geological Survey (USGS), 7.5 Minute Topographic Quadrangle of Port Huron, Michigan, 1991
- United States Environmental Protection Agency, Sole Source Aquifer Protection Program, Summery of Sole Source Aquifer Designations via the USEPA Web site.
- United States Geological Survey, Groundwater Atlas of the United States, Segment 9, by Perry Olcutt, HA 730-J via the Internet.
- United States Environmental Protection Agency, Safe Drinking Water Information System, via the USEPA Web site.

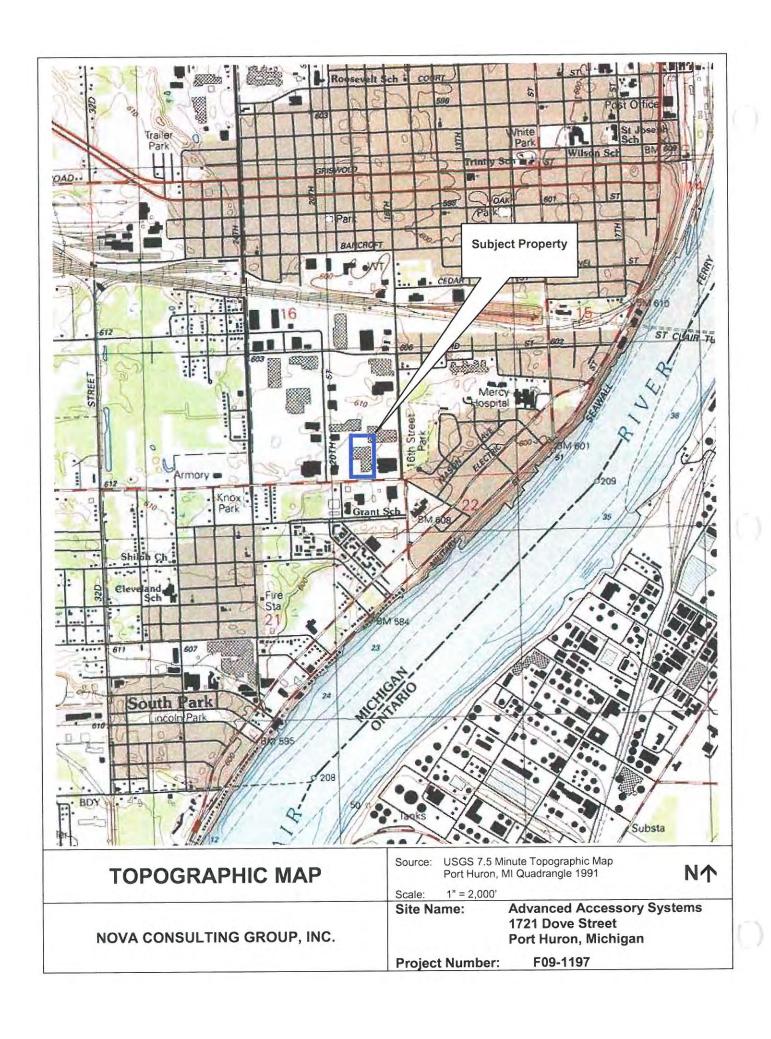
HISTORICAL REFERENCES

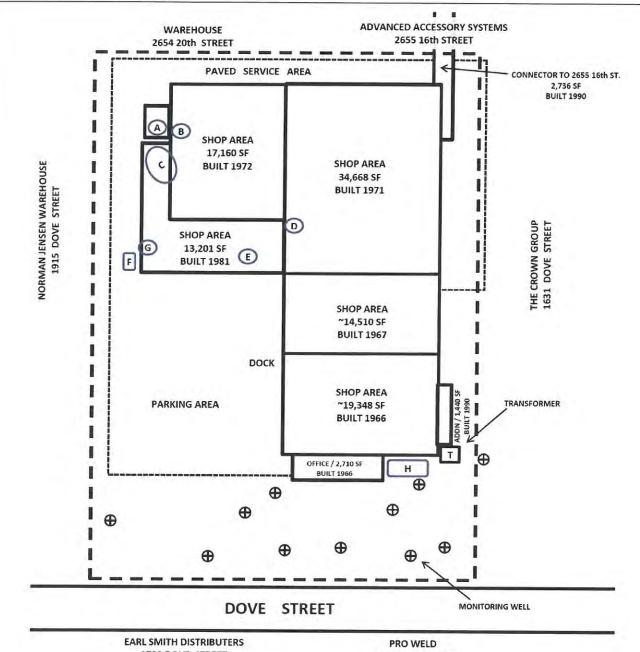
- Aerial Photographs Environmental Data Resources, Inc., 440 Wheeler Farms Road, Milford, Connecticut 06460, Aerial Photo Decade Package, Inquiry Number 2544604.4, July 22, 2009, Aerial Photographs for 1938, 1941, 1949, 1956, 1964, 1970, 1980, 1985, 1992, 2000, and 2005.
- City Directories Polk Port Huron City Directories and Port Huron / St. Clair County Hill-Donnelly Directories, St. Clair County Library System, 210 McMorran Blvd, Port Huron, Michigan 48060, 1938, 1946, 1953, 1957, 1963, 1968, 1974, 1980, 1986, 1992, and 2004.
- Sanborn Maps Environmental Data Resources, Inc., 440 Wheeler Farms Road, Milford, Connecticut 06460, Sanborn Map Report, Inquiry Number 2544604.3, July 16, 2009, 'No Coverage Report'.



FIGURES

SITE TOPOGRAPHIC MAP SITE DIAGRAM SITE LOCATION MAP





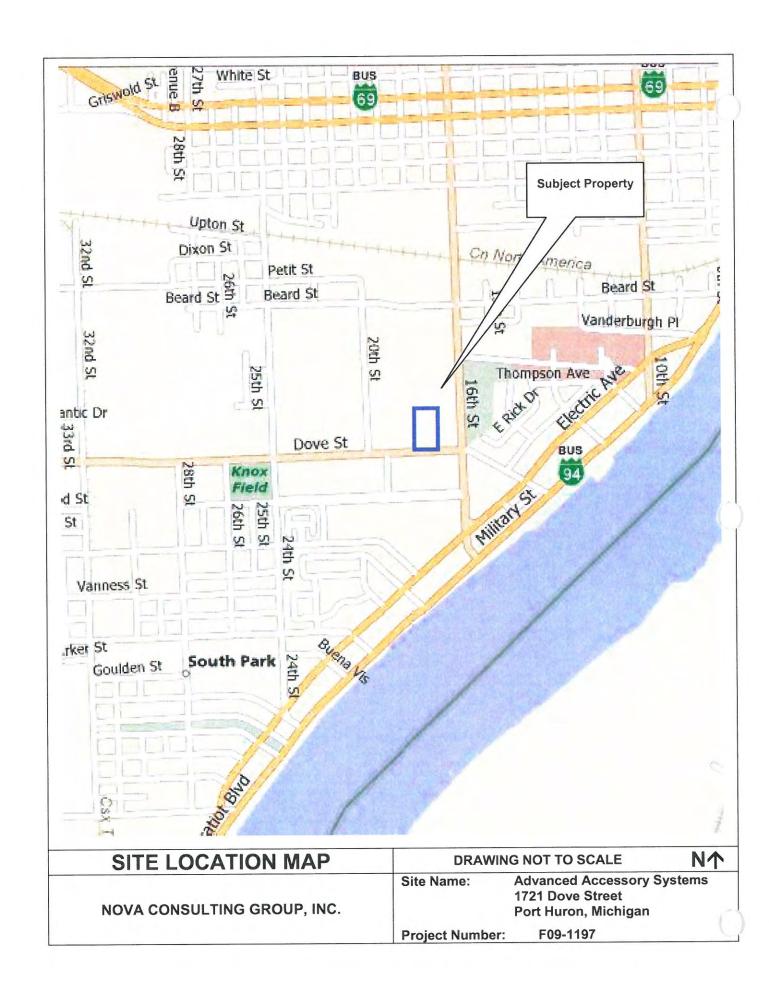
1730 DOVE STREET

1720 DOVE STREET

LEGEND

- A OIL HOUSE W/ 2 ASTS
- B WASTE OIL PUMP TANK
- C WASTE DRUM ACCUMULATION AREA
- D 2 HYDRAULIC FLUID TOTES
- E FORMER WWTP AREA
- F 20 CY WASTE DUMPSTER
- G DUMPSTER HYDRAULIC UNIT
- H FORMER UST AREA

| SITE PLAN | DRAWIN | NΥ | | | |
|-----------------------------|---|----------|--|--|--|
| NOVA CONSULTING GROUP, INC. | Site Name: Advanced Accessory Systems 1721 Dove Street Port Huron, Michigan | | | | |
| | Project Number: | F09-1197 | | | |



APPENDIX A RESUMES



MARK NAPOLITAN, P.E. NOVA ASSOCIATE

PROFESSIONAL EDUCATION

B.S. Chemical Engineering, Michigan State University, 1985

REGISTRATION:

Professional Engineer, Michigan #39909

SELECTED EXPERIENCE

Mr. Napolitan has approximately 20 years engineering experience in various environmental and general construction capacities. He has served as a project coordinator, senior project engineer, and project manager on a multitude of projects throughout the United States that involve expertise in the following areas: environmental assessment (property transfer); building decommissioning, demolition, and closure; Brownfield redevelopment & reuse; risk assessment; contamination assessment/remedial investigation; remedial design and feasibility studies; remedial system implementation and construction; remedial system operation and maintenance; hazardous waste disposal; toxic substance management and disposal; RCRA permit closures and Corrective Action; compliance audits; underground storage tank (UST) closure and remedial action; USEPA and state superfund programs; specification and bid document preparation; quality management and common process development; record drawing preparation and review; contractor bid solicitation, negotiations, and payment review; project scheduling and budget control; and environmental permitting.

Mr. Napolitan has prepared several hundred Property Condition Assessments and provided construction project monitoring for lenders involved with construction draws. He has been involved with implementation, standardizing work scopes and technical specification development, quality assurance/quality control and senior review of technical documents.

Mr. Napolitan has been involved with conceptual design, feasibility studies, treatability studies, construction design, and implementation of construction activities associated with a multitude of remediation projects including soil and groundwater treatment systems, landfill construction, surface water sediment removal and stabilization, RCRA HWMU covers and caps, and soil management of construction soils generated during redevelopment of industrial property.

Project manager on several construction and environmental decommissioning / demolition of over 20 large industrial facilities after cessation of production activities to properly prepare the property and improvements for sale 'as-is', strip-out, or demolition.



TIFFANY L. DARVELL PROJECT MANAGER

PROFESSIONAL EDUCATION

Bachelor of Arts, Environmental Studies University of Minnesota, Duluth, Minnesota, May 2001

CERTIFICATIONS/QUALIFICATIONS

- MDH Licensed Asbestos Building Inspector
- MDH Licensed Asbestos Contractor Supervisor
- MDH Licensed Asbestos Management Planner
- Asbestos 2-day Air Monitoring Course
- NIOSH 582 Certified
- OSHA 40 Hour Hazardous Waste Operations Certification (29CFR 1910.120)

SELECTED EXPERIENCE

As a Project Manager in Nova's Chaska, Minnesota office, Ms. Darvell is responsible for conducting and managing all types of Phase I environmental assessments as well as subsurface investigations.

Ms. Darvell has project management experience in Phase I and Phase II Environmental Assessments, and Operation and Maintenance Plans. She has also been involved in project management, personnel management, and client relations.

Ms. Darvell has managed Environmental Assessments for commercial, industrial and multi-family properties. She has performed and managed numerous projects including Phase I Environmental Site Assessments, subsurface soil and groundwater assessments, and on-going remedial projects. In addition, Ms. Darvell has conducted analyses for microbial contaminants, radon, asbestos, and lead-based paint in multi-family residences, commercial retail establishments, and industrial facilities.

Ms. Darvell has completed Phase I Environmental Assessments for commercial and retail properties, automotive service facilities, portfolios including assisted living facilities, and multifamily residential complexes, and has technical knowledge of Fannie Mae, Freddie Mac and HUD-MAP requirements for environmental assessments.

Ms. Darvell has dealt with wetland issues in Phase I Environmental Site Assessments and is knowledgeable about HUD/MAP. Ms. Darvell also has participated in various subsurface investigations, which include soil sampling and report preparation for each site.

Ms. Darvell has completed numerous indoor air quality investigations for commercial properties and residences. Investigations included building inspections, assessment of potential air quality issues, and sampling for bacteria and fungi in indoor air and building materials.

Ms. Darvell's previous experience includes organizing, and leading environmental education programs involving hazardous waste recycling and proper disposal. Ms. Darvell was responsible for working with and coordinating the efforts of various organizations, businesses, government officials and community members to create and implement a Household Hazardous Waste recycling program in Hennepin County.



GREGORY F. MURPHY VICE PRESIDENT CAPITAL MARKETS GROUP

PROFESSIONAL EDUCATION

Bachelor of Arts Environmental Studies, University of California, Santa Barbara, 1989

CERTIFICATIONS/QUALIFICATIONS

- Registered Environmental Assessor #06614
- AHERA Building Inspector, Certification No. 3141 BI

SELECTED EXPERIENCE

Mr. Murphy is a Vice President in Nova's San Francisco, CA office. As part of the Capital Markets Group, he offers 15 years experience in the commercial real estate assessment field. Mr. Murphy has managed more than 4,000 due diligence projects during his career, including Phase I ESAs, Phase II soil and groundwater investigations, property condition assessments, seismic studies, and asbestos studies. His primary responsibilities at Nova include providing all aspects of project management and coordination of these services for national clients. Mr. Murphy provides senior technical review of Phase I and Phase II environmental site assessments, and his work involves extensive client contact and project management nationwide.

The clients for whom Mr. Murphy has worked include CMBS and balance sheet lenders, mortgage bankers, attorneys, and equity participants in real estate acquisition. Mr. Murphy understands the often strict expectations of his clients and their projects, and he has a comprehensive understanding of due diligence needs within the capital markets.

Mr. Dean Teeples Metaldyne Corporation 29125 Hall Street Solon, Ohio 44139

Dear Mr. Teeples:

SUBJECT: Closure Report Receipt Date: September 24, 2004

Confirmed Release Date: May 1989

Location of Tanks(s): Sportrack Automotives

1721 Dove Street, Port Huron, St. Clair County, Michigan

Facility ID No. 0-0012081

In accordance with Section 21312a(2) of Part 213, Leaking Underground Storage Tanks (LUST), of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the Michigan Department of Environmental Quality (MDEQ), Remediation and Redevelopment Division (RRD) acknowledges receipt of your Closure Report. This Closure Report was submitted on your behalf by Conestoga-Rovers & Associates, Inc., Qualified Underground Storage Tank Consultant (QC), and certified by Mr. Thomas Kinney, Certified Underground Storage Tank Professional.

The Closure Report submitted by the QC concludes that corrective actions at the site have been completed in accordance with Part 213, and that corrective action at the site has resulted in *restricted use* of the site based on a Tier 1 evaluation, utilizing institutional controls. The following land use or resource use restriction mechanism has been established:

- A Restrictive Covenant has been recorded with the Register of Deeds for St. Clair County, as outlined in Section 21310a(2) of Act 451. The following land use or resource use restriction mechanisms are included in the Restrictive Covenant:
 - A drinking water well may not be installed or utilized.

The above list is abbreviated and does not necessarily represent a complete list of property or resource uses which are prohibited at the site. Any activities which would interfere with corrective action, operation and maintenance, monitoring, or other measures necessary to assure the effectiveness and integrity of the corrective action, or which would result in exposure to regulated substances above levels established in the corrective action plan are similarly prohibited.

disposal activities have occurred.

Since the STS soil detection of toluene in May 1989, through natural attenuation and further soil sampling analysis by NTH and CRA in the approximate location of the STS soil detection, toluene was not detected above Tier 1 Residential Drinking Water Protection RBSLs in and around the UST excavation area. A deed restriction was placed on the Site to restrict the use of on-Site groundwater as a drinking water source. The Site currently uses a municipal drinking water source.

Chromium and Toluene did exceed the Tier 1 Residential GSIP RBSLs. However, since there are no surface water bodies near the USTs and the City of Port Huron's storm sewers are combined with treatment prior to discharge, the GSIP criteria can be ruled out as a pathway.

The former toluene USTs did not historically store any chlorinated solvents, containing PCE or VC. In addition, PCE and VC were not detected in any of the soil samples collected in and near the toluene USTs.

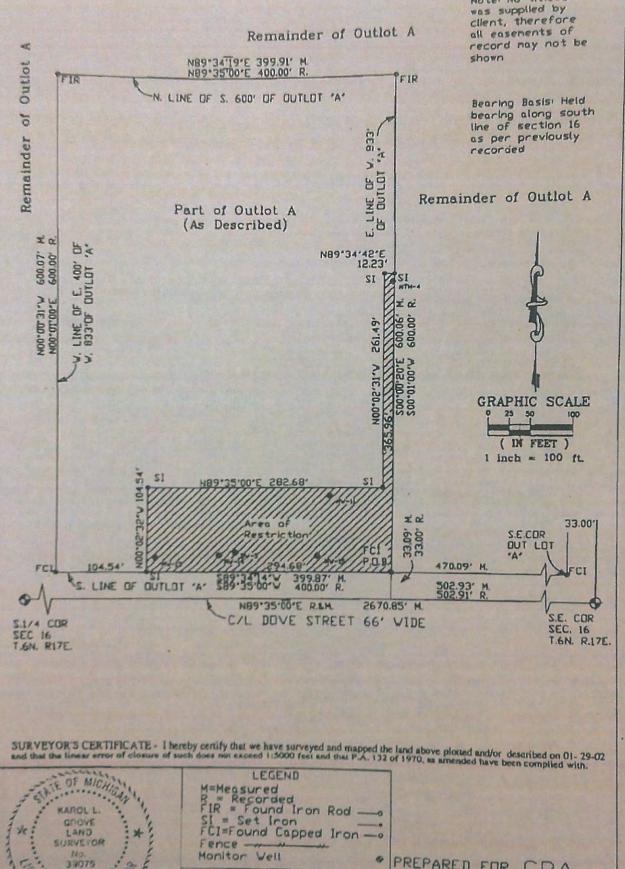
4.2 GROUNDWATER

The maximum remaining groundwater contaminant concentrations at the Site are presented in Table 4.2. Groundwater has not been actively remediated at the Site. No Site groundwater removal/disposal activities have occurred.

Results of the groundwater monitoring confirmed that the toluene impacted groundwater did naturally attenuate and that the plume did degrade and did not move off-Site.

The former toluene USTs did not historically store any chlorinated solvents, containing PCE or VC. In addition, the PCE and VC detections should not be associated with the former toluene UST release, based on the upgradient detection of PCE at NTH-4. The PCE and VC detections are to be addressed separately under Act 451, Part 201. Additional information pertaining to the PCE and VC groundwater contamination are referenced in the PHSR (October 1994).

No other groundwater units have been investigated.



Note: No titlework

M=Measured
R = Recorded
FIR = Found Iron Rod —
SI = Set Iron
FCI=Found Capped Iron —
FCI=Found Capped Iron —
FOUND FOUND CAPPED FOR CRA

NOVA Surveying & Mapping
21580 Novi Road, Suite 300
Novi, Michigan 48375
Licensed Professional
C248) 347-3512 Office
Surveyor #39075

M=Measured
R = Recorded
FIR = Found Iron Rod —
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FOUND FOUND CRA

NOVA Surveying & Mapping
21580 Novi Road, Suite 300
Novi, Michigan 48375

Licensed Professional
C248) 347-3512 Office
Surveyor #39075

SHEET 1 F 2

SEMUU This information is required under 1976 PA 444, as amended, ALL INFORMATION MUST BE TYPED OR PRINTED EXCEPT FOR WRITTEN SIGNATURES Company's Project/Reference Number Company Name or Organization (if applicable) 4-30-14 8745 **ASTI** Environmental Daytime Phone # (include Area Code) Requester's Last Name Requester's First Name 810-225-288 Carey Fax # (include Area Code) 810-225-3800 Address (Street and Number) 10448 Citation Drive, Suite 100 48116 ckratz@asti-env.com Brighton MI This request is for records from ☐ Lansing Central and/or ☒ District Office SE Mich Please indicate the county name of the materials you are requesting St. Clair County I wish to review the records listed below wish to receive a copy of the records listed below I wish to receive an estimate for the cost of fulfilling my request NOTE: To refine the searching process, you may wish to narrow down your request by calling the Environmental Assistance Center (1-800-662-9278) for assistance, or checking specific boxes related to particular divisions. If you do not see what you are looking for in the list below, please feel free to use the additional comments field. For additional program information, please click here. Programs: If you are only requesting the available information from certain programs, then please list the site number (i.e., Site 1, 2, etc. or "ALL") in the appropriate form field(s) provided below. (see division acronyms in site table below). 1, 2, 3, 4 2.4 OWMRP (RMG)- Hazardous Waste AQD - Permits 2, 4 RRD - BEA Only OWMRP (RMG)- Solid Waste 2 RRD - Environmental Remediation OOGM - Oil, Gas and Minerals 2 RRD - Leaking Underground Storage Tanks (Part 213) WRD - Groundwater RRD -Superfund WRD - Water Permits SUBMIT to Storage Tanks (Part 211)-WRD - Stormwater DLARA Jim Lucas - Lucasj@michigan.gov ODWMA (RMG)- Public Water Supply WRD - Wetlands Check boxes for each Division you are requesting files from (You must provide the section, township, range for oil, gas and minerals records

| Air Quality (AQD) | Oil, Gas & Minerals (OOGM) | Remediation & Redevelopment (RRD) | Resource Management (RMG) | Water Resources (WRD) |
|-------------------------|----------------------------------|---|--|--|
| | | | × | |
| x | | × | × | |
| | | | × | |
| x | | X | × | |
| | Quality (AQD) | Quality Minerals (OOGM) X | Quality Minerals (AQD) Redevelopment (RRD) | Quality (AQD) Minerals (OOGM) Redevelopment (RRD) Management (RMG) X |

ST. CLAIR COUNTY HEALTH DEPARTMENT 3415 - 28TM Street Port Huron MI 48060



ENVIRONMENTAL HEALTH DIVISION (810) 987-5306 Fex: (810) 985-5533

FREEDOM OF INFORMATION ACT REQUEST FORM

As a governmental agency, the County of St. Clair is required to comply with Public Act 442 of 1976, the Freedom of Information Act (FOIA). If you are interested in obtaining documents that fall within the requirements of the FOIA, you may submit a FOIA request in writing to the St. Clair County Health Department. Pursuant to the FOIA, the County of St. Clair is entitled to charge a fee for a public record search, the necessary copying of a public record for inspection, or for providing a copy of a public record when the FOIA request results in an unusually high cost to the County. You will be contacted by the FOIA Coordinator with any applicable charges prior to the mailing of the FOIA documents. It is understood that, by law, the St. Clair County Health Department has five business days to respond to your request.

\$1.50 for first copy (per location). 50¢ for each additional copy (per location). Additional charges may also apply.

| 1 1 |
|---|
| Date of Request: 426 14 YOUR NAME: Penelope Richardson-Bristol |
| YOUR ADDRESS: (Street, City, State, Zip) 10448 City on Dr |
| YOUR TELEPHONE NUMBER: 810-225-2800 prbristol @ asti-env.com |
| DESCRIPTION OF REQUESTED INFORMATION: records pertaining to landfilling activity, well/septic |
| spills/releases, 201 sites, ASTs, USTs, soil/water contamination |
| or other environmental conditions that may have occurred on the below |
| INFORMATION REQUESTED FOR THE FOLLOWING LOCATION: Is ted property. |
| STREET ADDRESS: 2654 20th St |
| TOWNSHIP / MUNICIPALITY: Port Huron 48060 SECTION NUMBER: 047-000 |
| Signature: for has |
| импинимпинимпинимпинимпинимпинимпинимпи |
| FOR HEALTH DEPARTMENT USE ONLY |
| Information provided: None Augil 9618 - NO PC Ords |
| - intormed, Denelope + on file for 2654 |
| Date request received: 450 / Date information sent / given 430 / 20 / 20 / 20 / 10 |
| Number of copies: Amount due \$ Receipt # MA |
| By: |
| S:\Stormwater\Public Education\Websitc\F07A Form.doc04/30/10 04/30/2010 |
| |
| (Youll among this |

ASTI Environmental

Fax 810.225.3800

Voice 800.395.ASTI

P.O.Box 2160 Brighton, MI 48116-2160

10448 Citation Dr., Suite 100 Brighton, MI 48116

Date: 4/24/14

To: FOLA Coordinator

Company: St. Clair County Health Acpt

Fax: 810-985-5533

From: Penelope Richardson-Bristol

Number of Pages: 2 (including this page)

Original Dwill Will not be forwarded.

RE: FOIA 2654 20th St Port Huron 74-6-182-0047-000

If all pages are not received, or if copies are illegible, please contact ASTI at the above number.

This facsimile message and the attached documents are privileged and confidential information intended only for the use of the individual or entity named above. If the reader has received this message in error, please notify us immediately and return the original message to us via mail. Thank you.

ASTI Provides Environmental Services in:

- Soils and Groundwater Remediation
- Wetlands Management/Permits
- Industrial Compliance Programs
- · ISO 14001 Assistance

- Site Assessments
- · Environmental Impact Studies
- Emissions Inventory
- * Training



Investigation • Remediation Compliance • Restoration

10448 Citation Drive, Suite 100 Brighton, MI 48116

Mailing Address: P.O. Box 2160 Brighton, MI 48116-2160

800 395-ASTI Fax: 810.225.3800

www.asti-env.com

April 28, 2014

Sue Child, CMC
City Clerk
100 McMorran Boulevard
Port Huron, MI 48060
Fax: 810-982-7872

Re: Request for Assessing, Building and Fire Dept Records

City Clerk Sue Child:

ASTI Environmental is conducting an environmental assessment for a site in Port Huron. ASTI respectfully requests opportunities to review Assessing, Building and Fire Department files. In terms of **Assessing** files we are interested in historical as well as current field cards. We are interested in **Building** records including site plans, permits and violocation that may have occurred on the property. Regarding Fire Dept records we are interested in files containing information about above ground storage tanks, underground storage tanks, chemical storage, spills/releases, dumping, HAZMAT incidences, or any other known environmental conditions on the Property.

Property: 2654 20th St, Port Huron, MI 48060 - Word 3

If no files are available, please reply to this request in an email to prbristol@asti-env.com, or contact me via phone at the number below.

Thank you,

AST_Environmental

Penelope Richardson-Bristol Property Services Group

(810) 225-2800

prbristol@asti-env.com

· NO AST/USTO

· no record of a nej spills/releases, dump or any other known

enveronne Hal issue

Runbook of Phemiso & Preplan into attached

Runbook of Premises

Occupancy ID Between "WIRT01" And "WIRT01

| Occupancy: WIRT01 WIRTZ MANUFACTURIN | ſĠ | P | roperty: | |
|---------------------------------------|----------------|------------------------|---------------|-------------|
| Station: E4 | Response Di | lstrict: E4 Insp | ection Distr | ict: E4 |
| Address: 2654 20TH ST | | C | ontact Infor | mation: |
| Port Huron, MI 48060 | | 0 | FFC 810-987- | 4700 |
| Prop Use: 700 Manufacturing, proces | ssing | | | |
| Mixed Use: | | | | |
| Struct Type: 1 Enclosed building | | | | |
| Prop Ownrshp: 1 Private | | | | |
| Bldg Stat: 5 Vacant and secured | | | | |
| Const Type: 4 Unprotected Non-combus | tible | | | |
| | | Floor | s Above Grou | nd: |
| | | Floor | s Below Grou | nd: |
| [X] Single Story [] 1-2 Family | | das | | Fire Flow |
| [] Residence [] Wood Shingle | | ft | | 3000 gpm |
| Construction Factor (Ci) | | Occupancy I | Factor (Ci) | |
| Class of Construction: CIDesc(coeff) | C | ombustability Class: | | |
| Coefficient: 0.8 | | Occupancy Factor: | 1.25 | |
| Length: 0 ft | | Exposed/Communic | cating Build: | ings |
| Width: 0 ft | | Exposure Factor | | |
| Total Area: 24000 ft | Co | ommunication Factor | | |
| Construction Factor: 2250 | | | | |
| | | | | |
| CYLIND Cylinders | eplan Code Inf | formation Verified: | / / | |
| PROPANE- 6 33LB CYLINDERS | | verified: | / / | |
| ACETYLENE AND OXYGEN - 6 SETS IN SHOP | AREA | | | |
| | | | | |
| DIRE Directions | | Verified: | / / | |
| KEY IN CHIEF 2 | | | | |
| ELEC Electrical Service | | Vorified. | , , | |
| NORTH WALL CENTER | | Verified: | / / | |
| NORTH HADD CONTER | | | | |
| EMLIT Emergency Lighting | | Verified: | / / | |
| YES- THRU OUT PLANT | | | , , | |
| | | | | |
| HVAC HVAC System Information | | Verified: | / / | |
| CEILING MOUNTED GAS UNITS (5) | | | . , | |
| | | | | |
| METER SOUTH SIDE EXTERIOR | | | | |
| NOTE SPECIAL NOTE | | Verified: | / / | |
| TOTAL DIRECTION TOTAL | | AETITIEG: | / / | |

Runbook of Premises

| C | ccupancy I | D Between | "WIRT01 | 11 | And "WIRT01 | |
|---|---------------|--------------|-------------|-----------|-------------|---|
| ENGINE 4 HAS KEYS T | O BUILDING | | | | | |
| RTKW Right to Kno STORED IN FIRST AID | | | | Ve | rified: / / | |
| | | Hvdr | ant Inform | ation | | |
| ‡1 2237 | 2500 20TH ST | - | | | | |
| Make/Model/Year: | | , | 0 | | | |
| Class: B Blue, 1 | 500+ GPM | | | Valve Loc | : | |
| Flow Test: 05/02/ | 2013 GPM: | 1780 @20ps | si: 0 | @10psi: | 0 @0psi: | 0 |
| | | Cont | act Informa | ation | | |
| Warshefski, Ken * Port Huron, MI 4806 HOME 810-989-2667 MOBL 810-434-0862 WIRTZ, JOHN/OWNER Port Huron, MI 4806 | * Keyholder * | | | | | |
|)ate: | Time: | | Activity | Code: | Staff: | |
| Comments: | | | | | | |

04/29/2014 12:51

Copy of Preplan Information by Occupancy

Occupancy ID Between "WIRT01

" And "WIRT01

WIRT01

WIRTZ MANUFACTURING

OFFC 810-987-4700

2654 20TH ST

Port Huron, MI 48060

Code Description Date Verified

CYLIND Cylinders

PROPANE- 6 33LB CYLINDERS

ACETYLENE AND OXYGEN - 6 SETS IN SHOP AREA

DIRE Directions

KEY IN CHIEF 2

ELEC Electrical Service

NORTH WALL CENTER

EMLIT Emergency Lighting

YES- THRU OUT PLANT

HVAC HVAC System Information

CEILING MOUNTED GAS UNITS (5)

METER SOUTH SIDE EXTERIOR

NOTE SPECIAL NOTE

ENGINE 4 HAS KEYS TO BUILDING

RTKW Right to Know

STORED IN FIRST AID ROOM

Building

City of Port Huron
Planning Department – Inspection Division
100 McMorran Boulevard, Port Huron, Michigan 48060

BUILDING PERMIT APPLICATION

| .0. 601 | Phone: | (810) 984-9733 | • Fax: (810) | 984-53 | 84 | |
|--|-------------------------|---------------------------------------|-------------------------|------------------------|---|-------------------------------------|
| Property # : 74-06/89 - (1)47 | (1) Date | Received >-25 | -07 | • | Permit No. PBC | 7-0452 |
| Site Address 20 774 | ST | 2654 | | Pl | AUT 3 | / |
| Owner T. H. 1 /1/0 | · フラ | MANGE | FACTURI'M | n | Phone | |
| J8712 -VU; N | -1 - | 197007 | 112/0/2/14 | | Zip Code | |
| WARD CONST CO | Address 4 | 1766 ASH | ler Rd | | Telephone Number | 2-7672 |
| City Kimball | State M | • | / | | Cell Number 8/0 30450 | 068 |
| Builders License No. | Expiration Date | | Worke | rs Comp I | nsurance Carrier or Reason fo タブデ | r Exemption |
| Federal Employer ID Number or Reason for | Exemption 74 | , | MESC | | Number or Reason for Exem | ption |
| Class of Work | ☐ Repair ☐ Alteration | ☐ Zoning☐ Sign | 1 | Demolition of issuance | on - Job to be completed and | site cleared within 30 days |
| Present Use of Building MANU FAC | | □ Sign | 12 | приимсе | у региш | |
| Change of Use FROM | 10kmg | | то | | | |
| Describe work to be performed | 4 11 | 1 5-1 | 24'x63 | / | | |
| Architect or Engineer | TO Add | ITION . | <u> </u> | | Phone | |
| Campbell & SHAU! ST | > / | MARYS | ville | | License # | |
| Total Job Value 35 000 | 7 | for T | Permit Fee | .a.o | Occupancy Group | Zoning Designation |
| Materials Schedule Stee Studs Ro | A M | OC | Type of Construc | | No. of Stories | # Existing Parking |
| Rafters per pla QS | Joists | OC | * | | N 65 15 11 1 | Spaces |
| Floor Joists plan OC Basement | Footings 92 Crawl Space | footing | ☐ Rental ☐ Owner Occupi | ied | No. of Dwelling Units | # Off-Street Parking Req. |
| Application Accepted Plans Checked | | roved før Issuance | Size of Bldg. Sq. | | 2 nd Floor = | |
| By: By: | By: | | | = | 3 rd Floor = | Sprinkler Req'd. Yes D No D |
| | Depth | · · · · · · · · · · · · · · · · · · · | 1 st Ploor | | Total = | 100 10 10 11 |
| NOT | ICE | | Inspections To B | | iting Rough Framing | □ Dry Wall g Final Before Occup. |
| Separate permits are required for Electri | ical, Plumbing, and | Heating, Ventilating | Special Appr | , | Approved | Denied |
| or Air Conditioning. | | | Electrical | 01410 | .,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | |
| This permit becomes null and void if | | | Plumbing | | | |
| commenced within 180 days or if constru | | • | Heating | | | |
| for a period of 180 days at any time after | WORK IS COMMENCE | 3. | Right-of-Way | | | |
| I hereby certify that I have read and exam | nined this application | on and know the same | Zoning | | | |
| to be true and correct. All provisions of | laws and ordinance | es governing this type | Historic District | ` | | |
| of work will be complied with whether sp permit does not presume to give authorit | | | Other (Specify) | | | |
| any other state or local law regulating | | | | | | |
| construction | 5 | 1 | COMMENT | J | | |
| | | | COMMENT | | | |
| "Section 23a of the state construction of | odes art of 1972 d | et No. 230 of Public | | Wal | ting for it | ro-t |
| Acts of 1972, being section 125.1523 | | | | | | |
| prohibits a person from conspiring to o | | | , | | Elevation | |
| of this state relating to persons who pe | | | | | 1 | |
| or residential structure. Violators of se Notify Miss Dig 42 hours in | | | | | | |
| Read all of application before signing | | , 1, 1, 1 | | | | |
| 11 | _ | | | | | |
| 1/1/4, V | | | | | | i |
| Signature of Contractor, Authorized Agent, of | or Owner | (Date) | | | | |
| 17 / 3-11, | | ` | | | | |

WHEN PROPERLY VALIDATED (IN SPACE BELOW) THIS IS YOUR PERMIT

RECEIPT NO. 2307 DATE ISSUED

CASH □

CHECK

City of Port Huron
100 McMorran Blvd., Rm. 301, Port Huron, Michigan 48060

BUILDING PERMIT APPLICATION

| D | | (810) 984-9733 | FAX (810) 982 | 2-78 | 72 | | | |
|--|----------------------------|---|---|-----------|----------------------|------------|-------------------|------------------|
| Property # 1/2-0047- | تص | Date Received | 22-95 | _ | Permit No. | Ch | 0 7 | (1) |
| Site Address 2654 20711 | <u></u> | <u> </u> | | | | <u>) U</u> | | <u> </u> |
| Owner | $- \sum_{i} T_{i}$ | TORT HU Address | RON MI | 4< | 60PO | | | |
| WIRTZ MANUF 1 | 105 | 24 th ST. P | H. Two. | | | Pho Zip | one 967 | 1 7700 1 7700 |
| Contractor | <u> </u> | Address | | | | Pho | | F 2/3 |
| Class of work | 290 | |). 610894 | | | Zip | | 1-0984 |
| ☐ Addition | | | □ Zoning □ Sign | (| Job to Demolition | be complet | ted and sit | e cleared within |
| Use of Building | | • | | (| /emonaon | 30 4 | days of iss | uance of permit, |
| Describe Work: | MAL | PACTURIN | 4 | | | | | |
| REMODEL EXIST | . Aart | ICE & BATH | 107/11 100 | _ | 0 11 - 11 4 | x 011 | I | |
| | · Utt | ICE & DAIS | FOOK INT | <u>.D</u> | BATHR | 0 029 | <u> </u> | |
| LUNCHROOM W | STD | PAGE ABI | かき | | | | • | |
| Architect or Engineer DVNN CDNSTR | , | Address | | | | Pho | ne | |
| Change of Use From: | | AS AF | RUVE | | | | | |
| | | | To: | | | | | |
| Total Job Value \$ 44,000 | <u> </u> | | Permit Fee: | 2 / | License # | | Expirati | on Date |
| Material Scheoule: Studs STEE | :1 | O.C. 1(.*) | 22 | ン —— | | | | |
| Rafters O.C. | Joists | 0.0. | Type of Construct | ion | Occupancy G | roup | Fed. Em | ployer I.D. |
| | Footings | | Size of Bldg. Sq. F | t. | No. of Stories | | Workers | Comp, Ins.: |
| Basement | Crawl Sp. | oproved for Issuamce By | <u> </u> | | Ac. C. Glones | | WOIKEIS | Comp, ms.: |
| The officer of the of |) ^ | oproved for issuance By | No. of Dwelling Un | its | Zoning Desigr | nation | MESC E | mployer No. |
| Lot Lot Frontage: Dept | | ./ | Max Occupancy | | Off Street Parl | | 0-1-11 | |
| | | | , 5000pano, | | On Street Fair | ang | Sprinkle YES □ | r Heqa. NO □ |
| NOTICE | _ | | Inspections To | | Footing | □ R | ough Fran | nina |
| Separate permits are required for E Ventilating or Air Conditioning. | =iectricai, | Plumbing, Heating, | Be Called For | | Drain Tile | | | Occupancy |
| This permit becomes null and void if w is not commenced within 180 days, | ork or cor | struction authorized | Special Approvals | | Approved | Der | nied | |
| suspended or abandoned for a period | of 180 da | struction or work is ays at any time after | Zoning | | | | | |
| work is commenced. | | | Electrical Plumbing | | | | | |
| I hereby certify that I have read and e know the same to be true and correc | ct. All pro | hae awel to annizive | Heating , | | | | | |
| ordinances governing this type of work specified herein or not. The granting o | will be co | molied with whather | Row | ••••• | | | | |
| to give authority to violate or cancel the | e provisio | ns of any other state | Other (Specify) | | | | | |
| or local law regulating constructi construction. | on or th | e performance of | | | | | | |
| "Section 23a of the state constru | ction cod | es act of 1972, Act | | , | | | | |
| No. 230 of Public Acts of 1972, being sec Complied Laws, prohibits a person fro | tion 125.1. | 523a of the Michigan | | | ž. | | | |
| he licensing requirements of this sta | ate relatir | na to persons who | | | * | | | |
| perform work on a residential buildin Violators of section 23a are subjected to | ig or a re p civil fine | esidential structure. s." | • | | | | | |
| lotify Miss Dig 48 Hours in Advance. | 800-482 | | | | | • | | |
| ead all of application before signing. | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | a de la companya de la companya de la companya de la companya de la companya de la companya de la companya de | | | | | |
| gnature of Contractor/Authorized Agent/Ow | ner | (Date) | | | | | | |
| WUE | N DRODER | LY VALIDATED (IN SPA | | | | | | |

CASH 🗆

Canary - APPLICANT

Goldenrod — FII F

DATE ISSUED:

Pink - ASSESSOR

White — INSPECTOR

City of Port Huron
100 McMorran Blvd., Rm. 301, Port Huron, Michigan 48060

BUILDING PERM

| | TAX (010) 302- | 012 | | |
|---|-----------------------|------------------|---------|-------------------------|
| Computer # 182 -0047 -000 Date Received | , -30-94. | Permit No. 2 | 74 D | 0360 |
| Site Address | | | (N | |
| <u> 2654 - 20th Street</u> | | | | |
| Owner Address | | | Phone |) |
| | 24th St. | | 987 | 7-4700 |
| Contractor Address | | | Phone | |
| Dunn Construction Engineering, Inc. | P.O. Box | 610884 | 984 | -5131 |
| | □ Sign (į | Job to t | | and site cleared within |
| Use of Building | u sign (t | ☐ Demolition | 30 day | s of issuance of permit |
| Manufacturing | | | | |
| Describe Work: | | | | |
| Add 66 x 100 to rear of existing b | uilding N | low narkin | g. Si | +0 |
| 0 | dirding. N | Cw parkin | 8. OT | re |
| improvement. | | | | |
| Architect or Engineer Address | | | Phone | |
| Dunn Construction Eng., Inc. P.O. | Box 610884 | | 984 | -5131 |
| Change of Use From: | To: | | | |
| | | 3001100 | 947. | 5 |
| \$232,850.00 Total \$45,000 Fdn. Only | Permit Fee: | License # | | Expiration Date |
| Material Schedule: Studs O.C. | 582- | | | |
| Rafters O.C. C. Joists O.C. | Type of Construction | . مُحس ا | | Fed. Employer I.D. |
| F. Joists O.C. | Sizo of Bldg. Sc. Et | 15 0 | | |
| | Size of Bldg. Sq. Ft. | No. of Stories | \ | Workers Comp. Ins.: |
| Application Accepted By Plans Checked By Approved for Issuance By | No, of Dwelling Units | Zoning Designa | ation 1 | JESC Caralana Na |
| | | Zorling Designa | 1 | MESC Employer No. |
| Lot Lot Frontage: Depth: | Max Occupancy | Off Street Parki | | Sprinkler Regd. |
| | | 915 | - ' | ES NO |
| NOTICE | Inspections To | ☐ Footing | Поп | gh Framing |
| Separate permits are required for Electrical, Plumbing, Heating, | Be Called For | ☐ Drain Tile | | I Before Occupancy |
| Ventilating or Air Conditioning. This permit becomes null and void if work or construction authorized | Special Approvals | | | |
| is not commenced within 180 days, or if construction or work is | Zoning | Approved | Denie | đ |
| suspended or abandoned for a period of 180 days at any time after work is commenced. | Electrical | 7.7.79 | | |
| I hereby certify that I have read and examined this application and | Plumbing | | | |
| know the same to be true and correct. All provisions of laws and | Heating | | | |
| ordinances governing this type of work will be complied with whether | Row | | | |
| specified herein or not. The granting of a permit does not presume to give authority to violate or cancel the provisions of any other state | Other (Specify) | For velitino | | |
| or local law regulating construction or the performance of | | 7-1-94 | | |
| construction. | | | | |
| "Section 23a of the state construction codes act of 1972, Act No. 230 of Public Acts of 1972, being section 125.1523a of the Michigan | , • | | | |
| Complied Laws, prohibits a person from conspiring to circumvent | | , | | |
| the licensing requirements of this state relating to persons who | | | | |
| perform work on a residential building or a residential structure. Violators of section 23a are subjected to civil fines." | | | | |
| lotify Miss Dig 48 Hours in Advance. 800-482-7171 | | | ı | |
| Read all of application before signing. | | | | |
| \mathcal{A} | | | | |
| | | | | |
| Dr. 16H /// 1/-2/211 | | | | |
| ANNI CHU 10/29/94 | · | | | |
| grature of Contractor/Authorized Agent/Owner (Date) | | | | |
| WHEN PRÓPERLY VALIDATED (IN SPA | CE DELOW) THIS IS Y | NID OFFICE | | |

White - INSPECTOR

DATE (SSUED: Pink - ASSESSOR

CHECK

Canary — APPLICANT

BUILDING PERMIT APPLICATION

| | | (313) 301-6 | 5000 EXT. 322 | | | ν |
|--|--|---|------------------------|---------------------|--|--|
| Computer # | -CO47-00 | Date Received | 9-19-91 | Permit No. | 2180 | / £ 5 |
| Site Address | 2074 STAL | | | | 27000 | -0 -1 |
| Owner N | 100 | Address | | | Phone | |
| Contractor | 1 | Address | | | Рһоле | |
| FRANK Y | 00206 | | | | 85-44 | 56 |
| □ New | ☐ Addition | ☐ Alteration [| ☐ Sign ☐ D | Job to emolition | | and site cleared within s of issuance of permit |
| Use of Building | | TA. | | | | |
| Describe Work: | PARNERS O | f existing | BLO6 | | | |
| | | (2)(1)(3) | | | | —————————————————————————————————————— |
| Architect or Designer | <u> </u> | Address | | | Phone | |
| Engineer | *************************************** | Address | | | Phone | |
| Change of Use From | | | | 40-44-41 | | |
| Change of Use to | | | Notify Miss Dig 48 Hou | rs in Advance. | 800-482-7171 | |
| Total Job Value | 0.000 | | Permit Fee: 50 | License # | Exp | piration Date |
| | Studs Wood | 6" o.c. | Type of Construction | Occupancy Gro | oup Fed | f. Employer I.D. |
| Rafters Control | O.C. C. Joists | O.C. | | | | |
| F. Joists | 0.C. Laws VOB. | a Sum on I AD | Size of Bldg. Sq. Ft. | No. of Stories | Wo | rkers Comp. Ins.: |
| Application Accepted By | Plans Checked By | Approved for Issuance By | No. of Dwelling Units | Zoning Designa | ation ME | SC Employer No. |
| Separate permits are | NOTICE | cal, Plumbing, Heating, | Max Occupancy | Off Street Parki | - | inkler Regd, |
| Ventilating or Air Cond | litioning. | sail i saingalig, i localing, | Special Approvals | Approved | Denied | |
| This permit becomes n | ull and void if work or | construction authorized | Zoning | | | |
| is not commenced wi | thin 180 days, or if | construction or work is | Electrical | , | | |
| suspended or abandor work is commenced. | ned for a period of 18 | 0 days at any time after | Plumbing | | · · · · · · · · · · · · · · · · · · · | |
| | house road and are | | Heating | | | |
| know the same to be | true and correct. All | ned this application and provisions of laws and | Appliance | | | |
| ordinances governing t | his type of work will b | e complied with whether | Other (Specify) | | | |
| specified herein or not | t. The granting of a p | ermit does not presume | o and (opesally) | - | | |
| to give authority to viol | ate or cancel the prov | isions of any other state | | | | |
| construction. | ing construction of | r the performance of | | | | |
| "Section 23a of th | e state construction | codes act of 1972, Act | | | | |
| No. 230 of Public Acts of | f 1972, being section 1: | 25.1523a of the Michigan | | | | |
| Complied Laws, prohil | bits a person from co | nspiring to circumvent | | | —————————————————————————————————————— | |
| the licensing requirem | ents of this state re | lating to persons who | | | | |
| Violators of section 23a | sidential building or are subjected to civil | a residential structure. fines." | | | | |
| | | 0 | | | | |
| Mark 1 | burg. | Ent 19 1991 | | | | |
| Signature of Contractor/Au | thorized Agent/Owner | (Date) | | | | |
| | | | | | | |

RECEIPT NO. 15733 White — INSPECTOR

Pink — ASSESSOR

DATE ISSUED: 10 - 22-5/ CASH [Goldenrod — FILE

General Property Information

City of Port Huron

[Back to Non-Printer Friendly Version] [Send To Printer]

Parcel: 06-182-0047-000 Unit: CITY OF PORT HURON Data Current As

Of: 4/25/2014 6:45:53 AM

Property Address [collapse]

2654 20TH ST

PORT HURON, MI 48060

Owner Information [collapse]

WES MANAGEMENT COMPANY

PO BOX 5006

PORT HURON, MI 48061-5006

Unit:

06

\$301,400

Taxpayer Information [collapse]

SEE OWNER INFORMATION

General Information for Tax Year 2013 [collapse]

301 - 301 INDUSTRIAL **Property Class: IMPROVED**

School District: 74010 - DISTRICT 74010 Taxable Value: N/A

State Equalized Value: Map #

User Number Indx: Date of Last Name Chg: 04/15/2008

Date Filed:

Assessed Value:

Notes: N/A

Historical District: N/A Census Block Group: N/A

Principal Residence Exemption June 1st **Final** 2014 0.0000 % 2013 0.0000 % 0.0000 %

| Previous Year Info | MBOR Assessed | Final S.E.V. | Final Taxable |
|--------------------|---------------|--------------|---------------|
| 2012 | \$327,200 | \$327,200 | \$327,200 |
| 2011 | \$351,200 | \$351,200 | \$351,200 |

Land Information [collapse]

| | Frontage | | Depth |
|--------------------|----------|----------------|----------|
| Lot 1: | 0.00 Ft. | | 0.00 Ft. |
| Lot 2: | 0.00 Ft. | | 0.00 Ft. |
| Lot 3: | 0.00 Ft. | | 0.00 Ft. |
| Total Frontage: | 0.00 Ft. | Average Depth: | 0.00 Ft. |

Total Acreage: 3.64 **Zoning Code:** M1

Total Estimated Land Value: \$91,000 Mortgage Code: NO

Land Improvements: \$84,234 Lot Dimensions/Comments:

Renaissance Zone: **Renaissance Zone Expiration**

Date:

5-06 - 5-06 INDUSTRIAL PARK ECF Neighborhood Code:

Legal Information for 06-182-0047-000 [collapse]

N 250 FT OF S 850 FT OF E 634.61 FT OF W 667.61 OUTLOT A ASSESSOR'S TWENTY-FOURTH STREET PLAT

Sales Information

| 0 sale record(s | s) found. | | | | | |
|-----------------|------------|------------|---------|---------|---------------|------------|
| Sale Date | Sale Price | Instrument | Grantor | Grantee | Terms Of Sale | Liber/Page |

Building Information

Manufacturing

| Description | | Floor Area | Yr Built | Est. | TC |
|---|--|--|------------------------------|-----------|------|
| Commercial/Industrial Building | 1 - Office Building | 2400 Sq. Ft. | 1991 | \$98 | 8,88 |
| General Information | | | | | |
| Floor Area: Occupancy: | 2400 Sq. Ft. Office Building | Estimated TCV: Class: | \$98,887 C | | |
| Stories Above Ground: | 1 | Average Story Height: | 9 | | |
| Basement Wall Height: Year Built: | 0 1991 | Year Remodeled: | 0 | | |
| Percent Complete: | 100% | Heat: | Package & Coolin | Heating | |
| | (40/ | Functional Percent Good: | | 9 | |
| Physical Percent Good: Economic Percent Good: | 64% 100% | Effective Age: | 22 yrs. | | |
| | 100% | | | \$170 | 0,65 |
| Economic Percent Good: Commercial/Industrial Building Manufacturing | 100% | Effective Age: 14600 Sq. Ft. Estimated TCV: | 22 yrs. | | 0,65 |
| Commercial/Industrial Building Manufacturing General Information Floor Area: Occupancy: Stories Above Ground: Basement Wall Height: | 100% 2 - Industrial, Light 14600 Sq. Ft. Industrial, Light Manuf 1 0 | Estimated TCV: acturing Class: Average Story Height: | 22 yrs. 1967 \$170,655 | | 0,65 |
| Commercial/Industrial Building Manufacturing General Information Floor Area: Occupancy: Stories Above Ground: | 100% 2 - Industrial, Light 14600 Sq. Ft. Industrial, Light Manuf | Effective Age: 14600 Sq. Ft. Estimated TCV: facturing Class: | 22 yrs. 1967 \$170,65. | 3 eaters, | 0,65 |

| 6600 Sq. Ft. Industrial, Light Manu | Estimated TCV: facturing Class: | \$158,067 S |
|--|---|---|
| 1 0 | Average Story Height: | 18 |
| 1994 | Year Remodeled: | 0 |
| 100% | Heat: | Space Heaters, Gas with Fan |
| 72% 100% | Functional Percent Good: Effective Age: | 100% 14 yrs. |
| | Industrial, Light Manu 1 0 1994 100% 72% | Industrial, Light Manufacturing Class: Average Story Height: Vear Remodeled: Heat: Functional Percent Good: |

6600 Sq. Ft.

^{**}Disclaimer: BS&A Software provides this Web Site as a way for municipalities to display information online and is not responsible for the content or accuracy of the data herein. This data is provided for reference only and WITHOUT WARRANTY of any kind, expressed or inferred. Please contact your local municipality if you believe there are errors in the data. **Privacy Policy**

REMEDIATION AND REDEVEOPMENT DIVISION PERFECTED LIEN LIST

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD) has perfected liens on property pursuant to Section 20138 of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), MCL 324.20101 *et seq.*

The following is a current listing of liens perfected by the RRD on property as of the date that appears on this list. The list will be updated <u>only</u> when the RRD has perfected a new lien on a property, or has released a lien from a property. A new date will then appear on the list. <u>This list does not include any lien(s) that may have been perfected by another DEQ Division or other entity</u>. For information regarding this list, please contact Darren Bowling at 517-284-5068 or by e-mail at <u>bowlingd@michigan.gov</u>. For lien information related to the Resource Management Division or the Office of Oil, Gas & Minerals, please call 517-335-6766 respectively.

The information provided herein cannot be construed or interpreted as legal verification that a perfected lien does not exist on a particular property, or that a lien is the only perfected lien on a property. To obtain legal verification, you must access official records from the appropriate County Register of Deeds and/or the Michigan Secretary of State when applicable.

| County | Township | City/Vlg | Address | Other Description | Lot No | Section | Town | Range | Tax Code |
|---------|--|---|--------------------------|---|---|--|---|--|--|
| Alcona | | Harrisville | 216 S. US23 | | | 13 | T26N | R9E | |
| Allegan | Watson | | | | | 24 | T2N | R12W | 23-24-001-10 |
| Allegan | Watson | es en entra entrante de la colo n e ntrante d e la timbre | | | | 24 | T2N | R12W | 23-24-001-10 |
| Alpena | namanan a marganin sentan kalan kalan kalan mana | Alpena | 4709 Long Rapids Rd. | Lake Winyah Shores Sub | Lot 43 | | × | | ngangemannggepalenenengunggesemplemannen |
| Antrim | Milton | Rapid City | 12929 Cherry Ave. | Plat of New Highlands | Lot 14 | | | Ministration and the second se | |
| Antrim | | Ellsworth | Vlg. Of Ellsworth | | | *************************************** | | n e - same e d <mark>e</mark> ntendes incomé destablism | |
| Antrim | | Ellsworth | Vlg. Of Ellsworth | | | AT ALL | | | |
| Antrim | | Ellsworth | Vlg. Of Ellsworth | | | 14 | T32N | R8W | 05-44-013-061-00 |
| Antrim | a a a secunda está a a latina el de construencia de describa en construida en de la constituida en constituida | Ellsworth | Vig. Of Ellsworth | nanonnassa, manna samuddidak nikum nika menkumandan sama (shusum disminkalana) | oonaannaantaantaantaantaanaantaanaantaant | 14 | T32N | R8W | 05-44-023-004-00 |
| Antrim | | Ellsworth | Vlg. Of Ellsworth | Vig Ellsworth | | 14 | T32N | R8W | 05-44-023-002-00 |
| Antrim | | Riverview | 6235 Crystal Springs Rd. | Supervisor's Plat of Riverview | Lot 1 | | | | |
| Arenac | Mason | Turner | 50 Mason Road | | | 12 | T20N | R5E | ina nemata manana ang ang ang ang ang ang ang ang an |
| Arenac | | Standish | 105 N. Main | Assessor's Plat 5 | Lot 370 | *************************************** | *************************************** | | 40-2-500-000-370-00 |
| Arenac | Mason | Turner | 50 Mason Road | | | 12 | T20N | R5E | |
| Baraga | L'anse | L'anse | Winter St. | почения подравнования в принцеприя почения в почения в почения в почения в почения в почения в почения в почени | | 9 | T50N | R33W | |
| Bay | kaanaan ka ka ka ka ka ka ka ka ka ka ka ka ka | Bay City | 1113 Center Ave. | James Fraser's First Addition | Lots 4&5, Blk 3 | ndanskou osečná ambakovano m | ana ina antono anti- | | adan an |
| Benzie | wind Chilippia in malayarah masanda dalah darah masaning dalah milandarah dalah milandarah dalah milandarah da | Lake Ann Vlg | P.O. Box 62 1st St. | | Lots 7 & 9, Blk 28 | en on manufacture de de la constitución de | andro-star section (sec | 2000-000-000-000-000-000-000-000-00-00-0 | Par dala menjandakan perdalajaran sama jake dan jake dan jake dan jake perdalajaran perdalajaran persembuah pe |
| Berrien | Benton | Benton Harbor | | | | | T4S | R18W | 11-045-18W-05DB |

1/24/2014

| County | Township | City/Vlg | Address | Other Description | Lot No | Section | Town | Range | Tax Code |
|-----------|---|--------------|--|--|--|--|--|---|--|
| Berrien | onner er en de en en er stante er værde er værd for de stat de en vær vær | Watervliet | 106 E. St. Joseph St. | Sutherland's Addition | Lot 1, exceptions | · · · · · · · · · · · · · · · · · · · | and the second | e "Matter a montanada base bases, " e- | |
| Berrien | | Watervliet | igner, og grafig <mark>e (1986 er 1</mark> 980er - 1984er) skypen ombre tillskilde for 1840er er 1840e r er 1840er er 1840er er | \$ 1999 198 0 1999 1999 1994 1995 1996 1996 1996 1996 1996 1996 1996 | ala un alta al al grapio al grapio de grapio de se en elementario de Persona conseguence elemento de la conseguence elemento della conseguence elemento della conseguence elemento della conseguence elemento elem | 2 | T3S | R17W | 11-21-0002-0015-01-0 |
| Berrien | | Watervliet | | | | 2 | T3S | R17W | 11-21-0023-0014-01-6 |
| Branch | Algansee | Quincy | 144/146 Crocket Drive | Woodland plat | Lot 2,3 & land | 5 | T7S | R5W | |
| Branch | Butler | | 1031 Clarendon Rd., Quincy, Michigan | | | 15 | T5S | R5W | NAC VARIANTINIA IN TOTAL TRANSICAL ARMENIA IN THE TRANSICAL ARMENIA IN THE TRANSICAL ARMENIA IN THE TRANSICAL A |
| Branch | Butler | | 1031 Clarendon Rd., Quincy, Michigan | | | 15 | T5S | R5W | |
| Branch | Algansee | Quincy | 144/146 Crocket Drive | Woodland plat | Lot 2,3 & land | 5 | T7S | R5W | Alemania ya Maria ilimiki atao bata alemania iliyo ya Maria |
| Calhoun | Bedford | Battle Creek | | Facility ID 00005228 | 66, 67, + land | 29 | T1N | R8W | 13-04-360-058-W |
| Calhoun | Bedford | Battle Creek | | Facility ID 00005228 | 66, 67, + land | 29 | T1N | R8W | 13-04-360-058-W |
| Calhoun | Marengo | Marshail | 1035 East Michigan Ave. | | ECONOCIO CONTRACEMBERA E ESCUENCIA DE CONTRACE. | 19 | T2S | R5W | |
| Calhoun | ti shinne-uu uu aan kaasa kaa aa aa dhahaa ta'aa kiin ah in ta'aa aa attle Creek | antikan di kandi >Kandi kandi ka | atutik di dalah 19 salaman menangan sebagai sebagai sebagai sebagai dalah sebagai dan persamban sebagai sebaga Terapa | n de ville de ville de le de verde au en en de la contratación de so. | 4 | T2S | R8W | 13-54-004-048-00 |
| Cass | | Dowagiac | 111 North Front St. | Patrick Hamilton's Add | Lot 12 | \$10************************************ | maru marana a ma | 2011 | kalanningan secarah seringan dan kalandar dan kalandar seringan seringan seringan seringan seringan seringan s |
| Cheboygan | | Cheboygan | | | | 29 | T38N | R1W | 16-053-029-303-002-00 |
| Cheboygan | | Cheboygan | rus annominastir a anna anna anna anna ann ann ann ann | J M Pennell's First Add to city | Lot 13, Blk 8 | | and deligate the state of the s | | W. Marian Company (1988) (1988) (1988) (1988) (1988) (1988) (1988) (1988) (1988) (1988) (1988) (1988) (1988) (1 |
| Chippewa | | Dafter | 9976 Soo Line Rd. | | | 21 | T46N | R1W | and the second s |
| Chippewa | Kinross | Kincheloe | | | | 19,20, 29,30 | T45N | R1W | 008-019-005-00 |
| Delta | Masonville | Rapid River | US2 | H.W. Cole's Second Add | Lots 7,8 Blk 11 | 29 | T41N | R21W | 21-012-341-007-00 & 21-012-179-021-00 & 21-012-179-020-00 |
| Eaton | | Grand Ledge | 105 E. Saginaw Hwy | Supervisors Plat #2 | Pt of Lot 179 | and the second second | and a fine to the second | | 23-400-078-001-790- 00 & 791-00 & 791-01 |
| Eaton | | | | | | *************************************** | terresis est est est est est est est est est es | | *************************************** |
| Genesee | Genesee | | | arrena arrena eta eta eta eta eta eta eta eta eta et | *************************************** | 33 | T8N | R7E | R-1006-22 |
| Genesee | | Flint | 603 Pingree Ave | Elm Park Sub | Lots 187-195, 196, 230 | | 3 ************************************* | erin erin (en la composition de la composition de la composition de la composition de la composition de la comp | 11-17-352-0187-87 |
| Genesee | Genesee | | | | *************************************** | 33 | T8N | R7E | R-1006-22 |
| Genesee | | Flint | 3402 Martin Luther King or 121 E. Pasadena | | Lots 548 & 549 | | *************************************** | 1900-100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 - 100 | an mananan nan |
| Genesee | | Flint | 3402 Martin Luther King | | Lots 544, 545, & 546 | | :::::::::::::::::::::::::::::::::::::: | | |

| County | Township | City/Vlg | Address | Other Description | Lot No | Section | Town | Range | Tax Code |
|----------------|---|---|---------------------------|---|--|--|---|--|---|
| Genesee | oo oo oo oo oo oo oo oo oo oo oo oo oo | Flint | 603 Pingree Ave | Elm Park Sub | Lots 187-195, 196, 230 | arte en arrechen arr | West and conference - Tax | | 11-17-352-0187-87 |
| Genesee | XIIIXIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII | Flushing | 90 E. Main St. | Assessor's Plat #5 | Pt of Lot 98, | | | | |
| Gladwin | minimi nomina minimi nome su eseper nome | Gladwin | 420 E. M-61 | Woodland Terrace Annex | 1,2,3&4 Blk 18 | 9 | T18N | R1E | |
| Grand Traverse | Blair | andanna disakus menenas, menessaadis adamenen a | 5175 Sawyer Wood Dr | Woodland Terrace Annex | Lots 1-4 Blk 18 | 7 | T26N | R11W | 28-02-007-047-20 |
| Grand Traverse | Blair | 100 100 100 100 100 100 100 100 100 100 | | ere ere ere ere ere ere ere ere ere ere | | 7 | T26N | R11W | |
| Grand Traverse | East Bay | AND LAND OF THE COURSE OF THE | | | | NULL II II II II II II II II II II II II I | T27N | R10W | 28-03220-020-00 |
| Hillsdale | Moscow | | | | | 15 | T5S | R2W | 30-03-015-200-012-15- 5-2 |
| Hillsdale | Moscow | 111111111111111111111111111111111111111 | | | | 15 | T5S | R2W | 30-03-015-200-012-15- 5-2 |
| Hillsdale | Scipio | | Mosherville Rd. | | | 10 | T5S | R3W | 30-02-010-100-011 |
| Ingham | | Lansing | 3125 MLK Blvd | O O O O O O O O O O O O O O O O O O O | The state of the s | 29 | T4N | R2W | 33-01-01-29-476-041 |
| Ingham | | Lansing | 300 North St. | Turner & Smith's Sub of Lot 6 of Townsend Sub. | Lots 1,2, & Pt. 3 of Lot 6 | } | an a munitarity and an annual | | A DARK MANAGARAN |
| Isabella | | Mt. Pleasant | 226 S. Main St. | | Lot 1 & Pt 2, Bli 25 | (| | 921131111111111111111111111111111111111 | |
| Kalamazoo | | Vlg. of Vicksburg | | Wolverton's Revised Addition | van de en en en en en en en en en en en en en | 18 | T4S | R10W | 39-15-18-100-018 |
| Kalamazoo | Alamo | ###################################### | | | | 26 | T1S | R12W | 01-26-251-019 |
| Kalamazoo | Wakeshma | Fulton | 13995 East W Ave. | | *************************************** | 16 | T4S | R9W | 16-16-490-190 |
| Kalamazoo | | Kalamazoo | 8011 West D. Ave | | 2001 CONTRACTOR CONTRA | 21 | T1S | R12W | |
| Kalamazoo | | Kalamazoo | 3501 South Burdick St. | Supv Plat of Henry Johnson Plat | Lot A | | | 4100 coox coox (1100 coox (1200 c | |
| Kalamazoo | | Portage | 9008 Portage Rd. | Ames West Lake Pk. | Lots 58,59,60 | allo morale de la companya de la companya de la companya de la companya de la companya de la companya de la co | en en en en en en en en en en en en en e | | ta dina di dia dia dia dia dia dia dia dia dia |
| Kalkaska | Kalkaska | | | | | 29 | T27N | R7W | |
| Kalkaska | Kalkaska | | | | | 29 | T27N | R7W | |
| Kent | oor accurate and the control of the | Grand Rapids | 2555 Oak Industrial Drive | ata atau mengenan mengenangan pengenangan mengenangan pengenangan pengenangan pengenangan pengenangan pengenan Pengenangan | ************************************** | 22 | T7N | R11W | territoria finale di trini, e effecio i finanzi distribili mono monograpi monograpi promono premio presidente d |
| Kent | ни и потичения расти потород додожува | Wyoming | 2539 28th St, SW | | | 9 | T6N | R12W | 41-17-09-451-013 |
| Kent | | Grand Rapids | | | 6,7,8,4,5 + add parcel | Maria (1919) ramananan mining | ann mar ann an an an an an an an an an an an an | WWW. COLOR OF COLOR O | 41-14-19-330-017 |
| Kent | Courtland | Rockford | 8413 Meyers Lake Rd. | | ************************************** | 33 | T9N | R10W | naansa annaan kasa ah ah ah ah ah ah ah ah ah ah ah ah ah |

| County | Township | City/Vlg | Address | Other Description | Lot No | Section | Town | Range | Tax Code |
|-------------|--|--|---|---|--|-----------|------------------------|-------|--|
| Kent | anananan menenanah menenbhanenah mener ses | Wyoming | 2539 28th St, SW | and the second second second second second second second second second second second second second second second | anamanan ing malayirinanan kepada anamanar | 9 | T6N | R12W | 41-17-09-451-013 |
| Lake | Pleasant Plains | a constitution of their man first in a flow and a visit of the second of | M-37 | Pere Marquette Plat | part of 20,21 | 22 | T17N | R13W | and the second s |
| Lake | Pleasant Plains | | M-37 | Pere Marquette Plat | 107,108,78,79 | 22 | T17N | R13W | 43-17N-13W-22BD |
| Lake | Pleasant Plains | | M-37 | Pere Marquette Plat | Lot 2052,53,80- 83,103-106 | 22 | T17N | R13W | |
| Livingston | and the second s | Brighton | ങ്ങം സംസ്ഥാനത്തിൽ വേണ്ടിയ വാണ്ട് - പാൻസ്സ്വോർ വേന്ദ്ര വേന്ദ്രത്തിൽ വേദ്യാവര്ക്ക് വാള് വാധ്യക്ഷി വാള് വാധ്യക്ഷവ വാള് വാള് വാള് വാള് വാള് വാള് വാള് വാള് | Smith & McPherson Addition | 219,220,221 | 30 | T2N | R6E | 18-30-300-017 |
| Livingston | Hamburg | | 10776 Hall Rd | | numatat tetra etta trastici na Nota con un un un un eser | 25 | T1N | R5E | 47-15-25-400-014 |
| Livingston | Putnam | | | 900 (10 °) (10 °) (10 °) (10 °) (10 °) (10 °) (10 °) (10 °) (10 °) (10 °) (10 °) (10 °) (10 °) (10 °) | | 27 | T1N | R4E | 14-27-400-002 30147080 |
| Livingston | | Brighton | | Smith & McPherson Addition | 219,220,221 | 30 | T2N | R6E | 18-30-300-017 |
| Livingston | | Fowlerville | 306 E. Grand River | Fowler's First Add | Lot 39 Blk 2 | | | | 05-11-302-014 |
| Livingston | Hamburg | | 10776 Hall Rd | | | 25 | T1N | R5E | 47-15-25-400-014 |
| Macomb | Macomb | Warren | tanaka dibidika disenden den menderim kanaka den den menderim menderim menderim kanaka den merebe | ettemmen menetelelemmeliteriler (i.) om vinte sittemmentelembenden av av av av av til men. En man 20. | Lot 33 & 13 | | taniferani tankantsi c | | 13-19-353-004 |
| Macomb | Chesterfield | | | | THE THE REAL PROPERTY AND THE REAL PROPERTY OF THE THE THE THE THE THE THE THE THE THE | PC 192 | T3N | R14E | 09-21-251-002 |
| Macomb | Chesterfield | e kuunneen aan parke aan mener engemen | CAPUTALSA 1948 CHUTTA CUSS AND AND AND AND AND AND AND AND AND AND | en a communicación de communicación de la communicación de la communicación de la communicación de la communic | VIII M ARANI KANDININI | PC 192 | T3N | R14E | 09-21-251-002 |
| Macomb | Chesterfield | | | | | PC 192 | T3N | R14E | 09-21-401-003 |
| Macomb | Chesterfield | er en en en en en en en en en en en en en | utantak di katan tahu tahu tahun menutah menutah kemerika terminin seria sahi dibikum mengalah sebelah sebelah | mentak Krausah andre 1915. A term samakan 1964 per 2 och 4 1960 men och 6 1966 men och 6 1966 med 1966 stört d | andrandra var er er er er er er er er er er er er er | PC 192 | T3N | R14E | 09-21-401-003 |
| Macomb | Shelby | | | | #63,64 | | повинин эмингис | | 07-18-401-005,50-07- 593-063-00; 07-18-401- 004, 50-07-593-064-00 |
| Macomb | Macomb | Warren | | | Lot 33 & 13 | | | | 13-19-353-004 |
| Monroe | Bedford | erciololita di distributa di comunica di constituti di constituti di constituti di constituti di constituti di | and the state of the state of the state of the state of the state of the state of the state of the state of the | ത്താവായ ത്രാവര് നട്ടു. ഡാവിഡ് ഡിയെ യാ ച്ച് ചെയ്യാന്റെ വിശ് മറ്റ് (1), ത്രിഡ് വായി താർട്ട് അവർക്ക് വര്യക്ക് വര്യക | hannan en er er er er er er er er er er er er er | 28 | T8S | R7E | 58-08S-07E-28BA |
| Montcalm | Bloomer | | en and men in Arabert in the analysis for an experience and an experience and an experience and an experience of | | | 12 | T9N | R5W | 59-051-700-040-00 |
| Montcalm | Reynolds | Howard City | | | | 35 | T12N | R10W | 59-017-900-083-00 or 092-00 |
| Montcalm | Reynolds | Howard City | | and and a service of the second second second second second second second second second second second second s | and the state of t | 35 | T12N | R10W | 59-017-900-083-00 or 092-00 |
| Montmorency | | Atlanta VIg | 103 State St. Box 615 | | Lots 5 thru 11, Blk 7 | | | | |
| Newaygo | Everett | | | | and the state of t | 17 | T13N | R12W | |

| County | Township | City/Vlg | Address | Other Description | Lot No | Section | Town | Range | Tax Code |
|--------------|--------------------------|--|--|--|--|--|--|--|--|
| Newaygo | Everett | | 1200 VII. 12. 120. Million SANI III. 1200 ANIA ANIA ANIA ANIA ANIA ANIA ANIA AN | a. Antogramming in 1995 and annivers of anniverse of an interference of an interference of an interference of a | * 6. 16. 4000000000000000000000000000000000000 | 17 | T13N | R12W | and the series of the Committee and the series are the series and the series and the series and the series and the series and |
| Oakland | West Bloomfield | West Bloomfield | 7055 Cooley Lake Rd., | Dewey Beach Sub | Lots 371-374, Pt 375-378 | and the section of th | 67 (buse: 20 cs -com | | 18-06-229-033 |
| Oakland | Independence | | | | | 33 | T4N | R9E | 08-33-426-001 |
| Oakland | Farmington | Farmington Hills | 29024 Grand River | Richland State Sub. Resub of Richland's Gardens Sub | Lots 45-51 | 36 | T1N | R9E | 23-36-304-022 |
| Oakland | Waterford | 1100 (1011) | Whitfield Estates | | Lot 310 | sn | | | 13-08-153-001 |
| Oakland | Independence | (AL-MCMONONINA) | | | | 33 | T4N | R9E | 08-33-451-001 |
| Oakland | Waterford/ White Lake | | | anderson (III) en en en en en en en en en en en en en | | 7&18 12 | T3N T3N | R9E R8E | 13-07-100-008 12-12- 200-007 |
| Oakland | | Milford | City of Milford | | | 10,11 | T2N | R7E | 16-10-228-003 |
| Ogemaw | Hill | Lupton | 3610 Forest Dr. | Shady Shores Park sub of Gov't Lot 2&3 | Pt Lot 1 Blk A, Pt. of Lot 8 | 8 | T23N | R4E | |
| Osceola | | Evart | 202 E. Seventh | | 479 | N. (1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1 | Bacaba antonomina | INTERNAL III III II | |
| Osceola | Highland | Marion | 18814 M-115 | | | 35 | T20N | R8W | |
| Osceola | Orient | | | | and angen and an entry and an entry and an entry and an entry and an entry and an entry and an entry and an en | 21 | T17N | R7W | 67-11-021-021-10 67- 11-021-022-10 |
| Osceola | Orient | | | andere Great Marie et a comment de la comment de la comment de la comment de la comment de la comment de la comment | and the second s | 21 | T17N | R7W | 67-11-021-021-10 67- 11-021-022-10 |
| Osceola | Hartwick | herkersters (All 1999) Pallindidd daeth (All 1999) | · | · | S. 714.01.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1. | 1 | T19N | R8W | 67-04-001-001-00 |
| Osceola | Hartwick | | | <mark>a Marini (ministra esta parte esta en esta proportione de la marini de la marini de marini de marini de la marini de marini d</mark> | | 1 | T19N | R8W | 67-04-001-001-00 |
| Ottawa | Crockery | Vlg of Nunica | | Adsit's Add | Lot 3, Blk 3 | 15 | T8N | R15W | 70-04-15-430-018 70- 04-14-320-002 |
| Ottawa | Tallmadge | en en en en en en en en en en en en en e | matetia liika eti kuttuu olimmaa eta kannuu maliimus kunnuu oleku liitäi maanuu on oleku kuloossa een ee | ett till kant til ett en en en ett til ett til ett en en en en en en ett til til en ett en en en ett ein kal M | Gov't 4 | 12 | T6N | R13W | 70-14-12-400-003 |
| Ottawa | | Grand Haven | | Rycenga's Plat 3 | 197 | 21 | T8N | R16W | 70-03-21-415-018 |
| Presque Isle | Presque Isle | Precedent forms and succession and an arrangement | 17661 Grand Lake Blvd. | | 17 | etadaga e e e e e e e e e e e e e e e e e e | | | |
| Presque Isle | Presque Isle | | 17661 Grand Lake Blvd. | | 17 | | (a.e | | THE CONTRACT OF THE CONTRACT O |
| Presque Isle | Presque Isle | | . О ФИТО В СОВОТОТНИКИ В СОВОТОТНИКИ В В СОВОТОТНИКИ В В СОВОТОТНИКИ В В СОВОТОТНИКИ В В СОВОТОТНИКИ В В СОВОТ | Lot 17, of SUPERVISOR'S PLAT OF SPRINGFIELD CAMP | 17 | again againm a na an an an an an an an an an an an a | | general egypty (the gold polytypy (gold en en en en en en en en en en en en en | er engelekter Modelta. Mikitada engenerengenera engegenera engegenere engelekter |
| Presque Isle | Presque Isle | | | Lot 17, of SUPERVISOR'S PLAT OF SPRINGFIELD CAMP | 17 | | and the second s | nd Accobertum | ekilenter (2004) (en mone, ekilenter och etter ett en en med etter ett etter ett etter etter etter etter etter |
| Roscommon | Denton | | | | | TOTAL CONTRACTOR OF THE STATE O | « ишшишши шки»: | | |

| County | Township | City/Vlg | Address | Other Description | Lot No | Section | Town | Range | Tax Code |
|------------|---|--|--|--|--|---|---|--|--|
| Saginaw | an ana a Maria a da a a a a a a a a a a a a a a a a | Chesaning | 525 E. Broad St. | and the second second second second second second second second second second second second second second second | Pt of Lot 5, Blk 15 | 16 | T9N | R3E | kanna kalamahering edominina mesara tantan kesali mampi dibang dibang dibanggan dibanggan dibanggan dibanggan |
| Shiawassee | Shiawassee | | | | ennon de la companya de la companya de la companya de la companya de la companya de la companya de la companya | 26 | T6N | R3E | - |
| Shiawassee | | Owosso | 1509 W. Oliver St., City of Owosso | | | 14 | T7N | R2E | 50-537-000-048-00 |
| Shiawassee | Shiawassee | and the second second second second second second second second second second second second | and the state of t | | | 26 | T6N | R3E | ************************************** |
| Shiawassee | | Owosso | 210-300 E Monroe St. | A L Williams Second Addition | Blk 1= 9,10,1; Blk 2 = 1-13 AL Williams Second Add | 24 | R2E | T7N | 78-010-652-001-004 |
| Shiawassee | | Owosso | 1725 Corunna Ave. | A V Johnson's Add | Lots 4,5,11, 12,13 Blk 8 | | *************************************** | and the second s | and the second s |
| St. Clair | Clay | DOMESTIC STATE OF STATE OF STATE OF STATE OF STATE OF STATE OF STATE OF STATE OF STATE OF STATE OF STATE OF ST | 3601 Rattray Lane | | Lots 1 & 3 | | | | 74-14-618-0049-000 |
| St. Joseph | Colon | | | | | 3 | T6S | R9W | |
| St. Joseph | Colon | | | | and Control of the Control of the Second Control of the Control of | 3 | T6S | R9W | |
| Tuscola | Wisner | Fairgrove | 9006 Bay City Forestville Rd. | | Parcel B | 29 | T14N | R7E | 10-01-0004-790-06 |
| Tuscola | m vito and vide and vivia and vide and | Caro | | Plat of Centerville (Caro) | 1and pt 2 Blk23 | 3 | T12N | R9E | |
| Van Buren | | Vlg of Paw Paw | | | | 13 | T3S | R14W | |
| Van Buren | | Vlg of Paw Paw | | Maria de la compania | | 13 | T3S | R14W | |
| Wayne | and the second second second second second second second second second second second second second second second | Woodhaven | | | 1100.9410.00.000.000.000.000.000.000.000.000.0 | 28 | T4S | R10E | 59-080-99-0008-000 |
| Wayne | Brownstown | Flat Rock | | | | 28 | T4S | R10E | 58-081-99-0001-000 |
| Wayne | Brownstown | Flat Rock | | | | 28 | T4S | R10E | 58-081-99-0001-000 |
| Wayne | Brownstown | Flat Rock | | 2017 D. G. G. G. G. G. G. G. G. G. G. G. G. G. | iiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiiii | 28 | T4S | R10E | 58-081-99-0002-000 |
| Wayne | Brownstown | Flat Rock | en non otherta a sen enteren. Landreau el terte essen es <mark>umen inner de describi</mark> escende de la la come, escende | and a superior superior superior de de de conservant de conservant de conservant de conservant de conservant d | en ann ann air dean de ann an an dean an dean an ann an an ann an ann an ann an ann an a | 28 | T4S | R10E | 58-081-99-0002-000 |
| Wayne | | Woodhaven | | | | 28 | T4S | R10E | 59-080-99-0004-000 |
| Wayne | | Woodhaven | | | | 28 | T4S | R10E | 59-080-99-0008-000 |
| Wayne | er ann sacrastannan mannan an an an a | | 65 Piquette | 65 Piquette | -Rassina (d. <mark>Status</mark> barbarbarbarbarbarbarbarbarbarbarbarbarb | oomaanda oo oo oo oo oo oo oo oo oo oo oo oo oo | | | 01-1788-91 |
| Wayne | en approprieta en grant de la companya de la companya de la companya de la companya de la companya de la compa | Detroit 48227 | 14000 Fenkell | Davy's Fenkell Ave Sub | Lots 33-36 | ((1) 10 mm) | | (C. 34 - C. 26 (2000) | |
| Wayne | | Detroit | 4445 Lawton aka 4450 Lawton | Plat of RR Concessions, PC 729 | 41-58, Out Lot 8 | 3, | National Property | HIRESCO CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONT | |

| County | Township | City/Vlg | Address | Other Description | Lot No | Section | Town | Range | Tax Code |
|---------|--|----------|--|--|---------------------------------------|---------------------------------------|-------------------------------------|-------|------------------|
| Wexford | an an an an an an an an an an an an an a | Cadillac | www.mana.anina.anindha.d.a.u.v. zazaziz zazizindizaniha.anindha.anindha.ani | Improvement Board's Add to City of Cadillac | Blk 152,153,154;pai 156,157,155 | 32 rt | T22N | R9W | 100680000100 |
| Wexford | 99000000000000000000000000000000000000 | Cadillac | austrationer i de Authoritet de Court de State (1904) et l'estre l'authorite de l'estre l'estre l'estre l'estr | Outlot 6 Cummer & Hayes Add. | Outlot 6 | ann sianna ea an ann ann an ann an an | on an activities and activities and | | 10-056-00-026-00 |
| Wexford | | Cadillac | Blk 14 | | 4,5,6 | | | | |
| Wexford | | Cadillac | and the second s | Improvement Board's Add to City of Cadillac | Blk 152,153,154;pa 156,157,155 | 32 rt | T22N | R9W | 100680000100 |

Wexford

APPENDIX E

Historical Research Documentation
Aerial Photographs
Sanborn Map Report



2654 20th St

2654 20th St Port Huron, MI 48060

Inquiry Number: 3925559.5

May 02, 2014

The EDR Aerial Photo Decade Package



EDR Aerial Photo Decade Package

Environmental Data Resources, Inc. (EDR) Aerial Photo Decade Package is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's professional researchers provide digitally reproduced historical aerial photographs, and when available, provide one photo per decade.

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Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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Date EDR Searched Historical Sources:

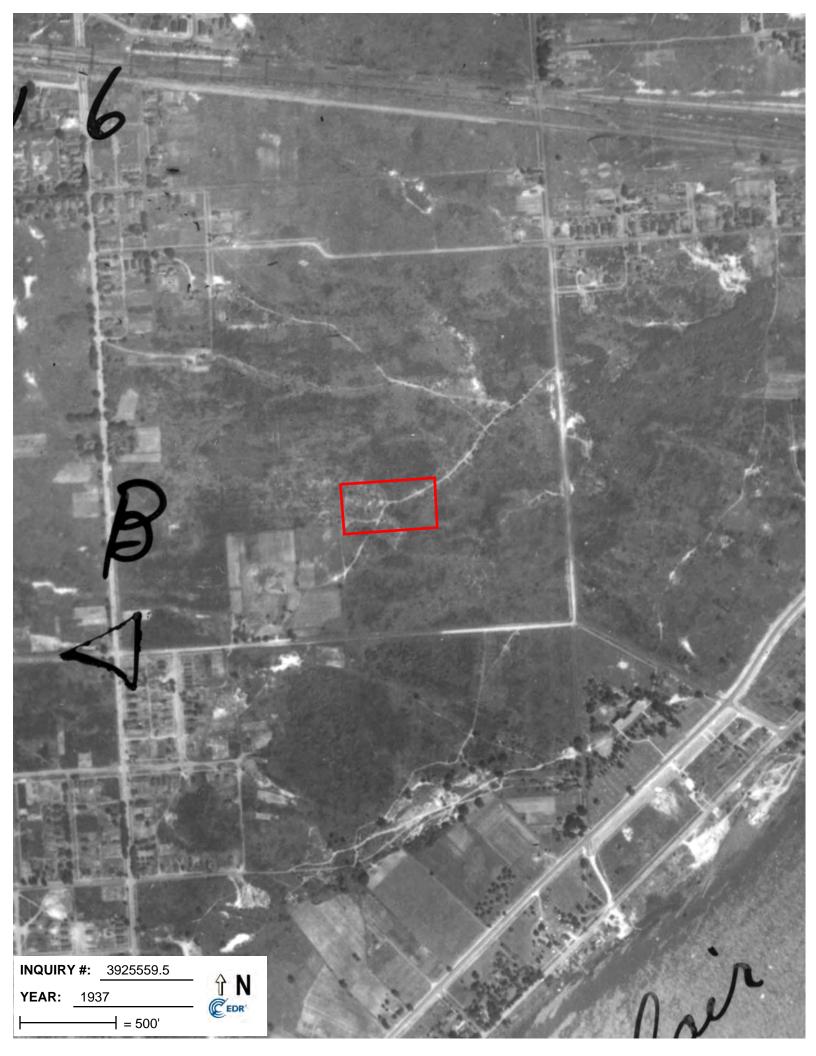
Aerial Photography May 02, 2014

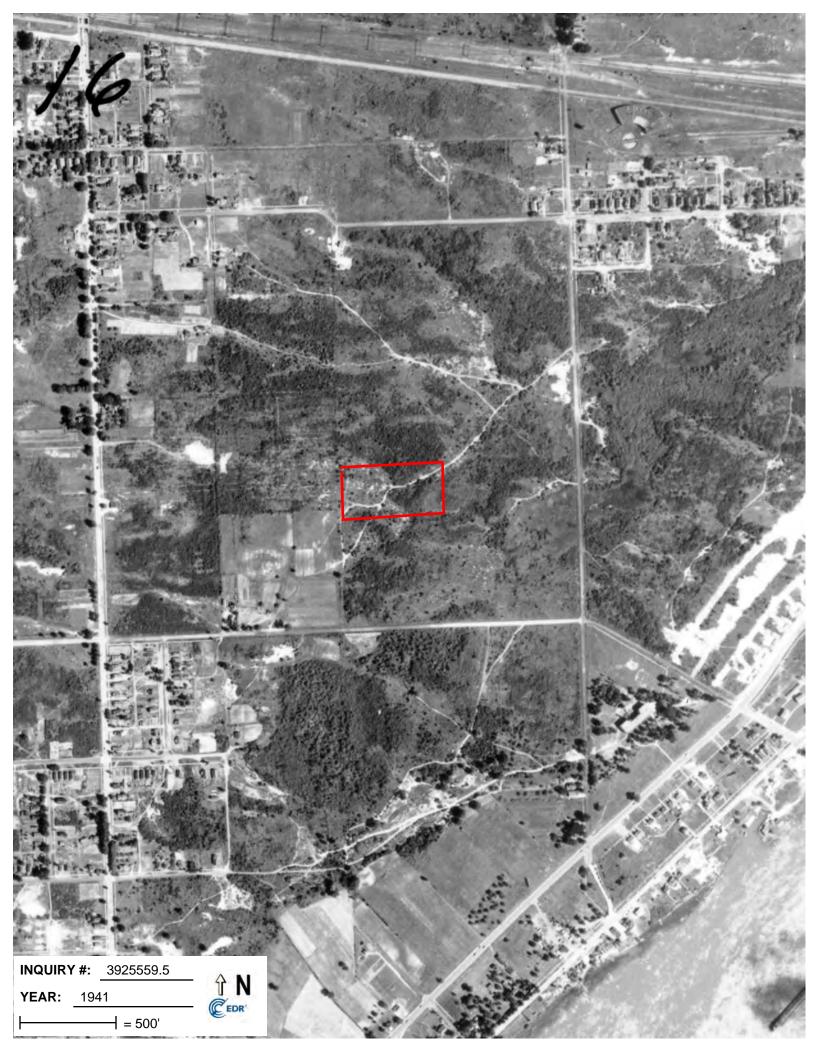
Target Property:

2654 20th St

Port Huron, MI 48060

| <u>Year</u> | <u>Scale</u> | <u>Details</u> | <u>Source</u> |
|-------------|-----------------------------------|---------------------------------|---------------|
| 1937 | Aerial Photograph. Scale: 1"=500' | Flight Year: 1937 | AAA |
| 1941 | Aerial Photograph. Scale: 1"=500' | Flight Year: 1941 | AAA |
| 1949 | Aerial Photograph. Scale: 1"=500' | Flight Year: 1949 | PMA |
| 1956 | Aerial Photograph. Scale: 1"=500' | Flight Year: 1956 | CSS |
| 1964 | Aerial Photograph. Scale: 1"=500' | Flight Year: 1964 | ASCS |
| 1970 | Aerial Photograph. Scale: 1"=600' | Flight Year: 1970 | SCS |
| 1980 | Aerial Photograph. Scale: 1"=600' | Flight Year: 1980 | ASCS |
| 1985 | Aerial Photograph. Scale: 1"=500' | Flight Year: 1985 | SEMCOG |
| 1992 | Aerial Photograph. Scale: 1"=500' | Flight Year: 1992 | FSA |
| 1999 | Aerial Photograph. Scale: 1"=500' | /DOQQ - acquisition dates: 1999 | EDR |
| 2005 | Aerial Photograph. Scale: 1"=500' | Flight Year: 2005 | EDR |
| 2006 | Aerial Photograph. Scale: 1"=500' | Flight Year: 2006 | EDR |
| 2009 | Aerial Photograph. Scale: 1"=500' | Flight Year: 2009 | EDR |
| 2010 | Aerial Photograph. Scale: 1"=500' | Flight Year: 2010 | EDR |
| 2012 | Aerial Photograph. Scale: 1"=500' | Flight Year: 2012 | EDR |





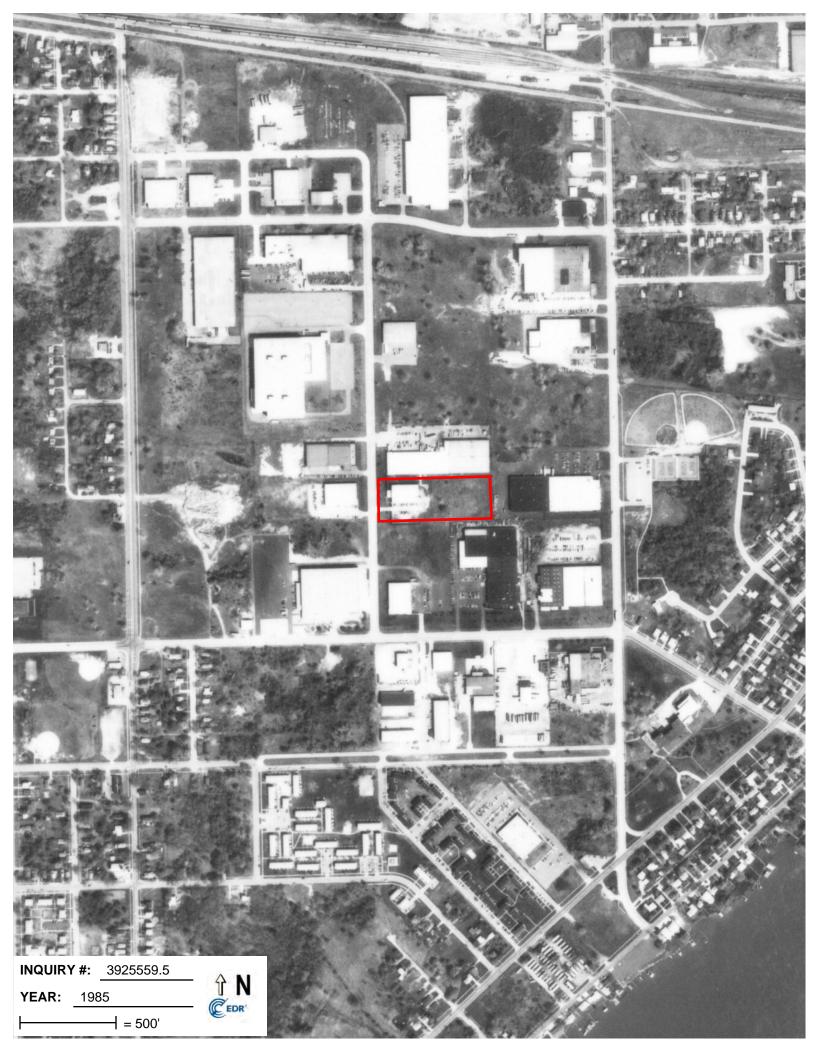


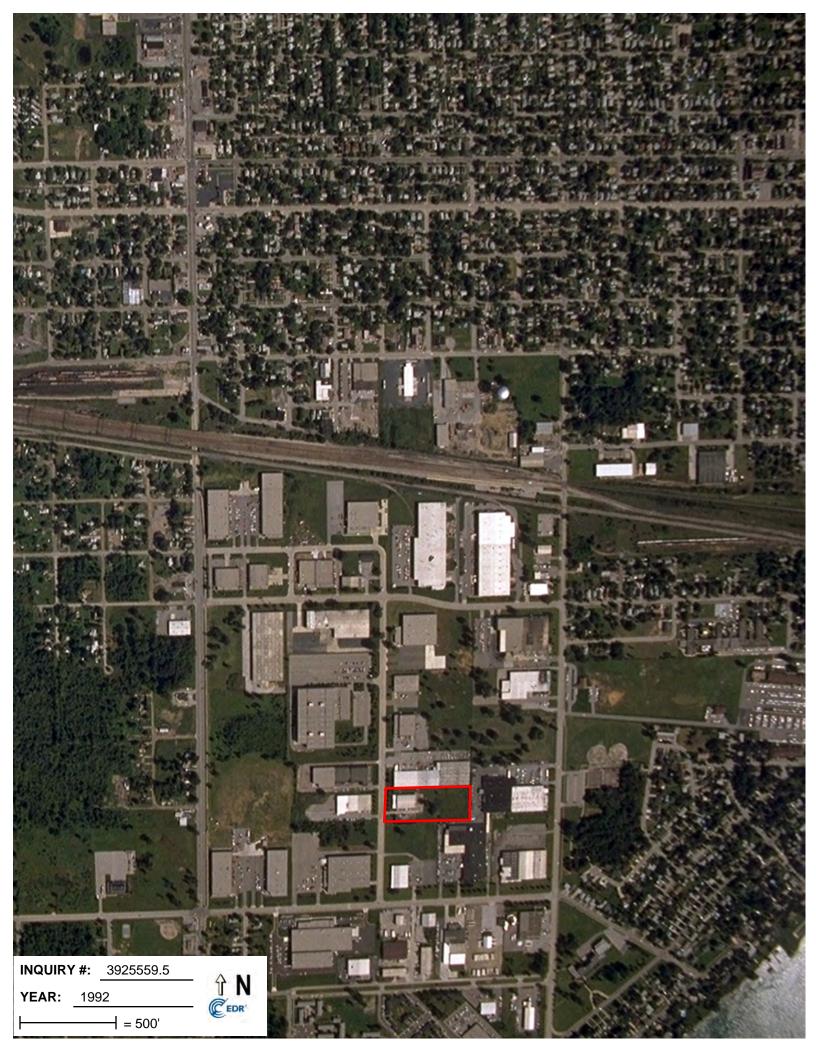
























2654 20th St

2654 20th St Port Huron, MI 48060

Inquiry Number: 3925559.3

April 28, 2014

Certified Sanborn® Map Report



Certified Sanborn® Map Report

4/28/14

Site Name: Client Name:

2654 20th St Applied Science & Technology 2654 20th St 10448 Citation Drive

Port Huron, MI 48060 Brighton, MI 48116

EDR Inquiry # 3925559.3 Contact: Penelope Richardson-



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Certified Sanborn Results:

Site Name: 2654 20th St **Address:** 2654 20th St

City, State, Zip: Port Huron, MI 48060

Cross Street:

P.O. # 8745 **Project**: NA

Certification # 6078-4AD1-9738



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APPENDIX F

QualificationsResume



RESUME

ASTI ENVIRONMENTAL



CAREY S. KRATZ Manager - Phase I ESAs Associate III

PROFILE

Certifications
Certified Asbestos Inspector, Michigan #A27278
HAZWOPER Incident Commander
HAZWOPER 40 hour Training

Education

Lake Superior State University, B.S. Environmental Science 1999 Mott Community College, Associate in Science 1997

Experience History

Project Manager, Property Services Group, ASTI Environmental Environmental Site Assessor, Property Services Group, ASTI Environmental Data Technician, Property Services Group, ASTI Environmental

Professional Background

Ms. Kratz has performed Phase I Environmental Site Assessments and asbestos inspections of residential, commercial and industrial property in Michigan. Work has included vacant land, apartment complexes, offices, restaurants, storage facilities, gasoline stations, commercial structures, former landfills and operating industrial facilities. She has identified Recognized Environmental Conditions in Phase I reports, and has provided alternatives to owners of properties with asbestos materials. The property evaluations included site inspections, historical research, and contact with state and local agencies.

Years Experience: 14 – ASTI ENVIRONMENTAL

ASBESTOS INSPECTION PROJECTS

<u>Asbestos Management, Washtenaw County Road</u> Commission

Inspected residence obtained in right-of-way acquisition for asbestos. Collected samples for laboratory analysis. Provided report of federal and state requirements for removal for scheduled fire department burn exercise.

<u>Asbestos Inspection, Crestview Apartments, Fenton</u> Inspector of asbestos hazards at apartment property in Fenton. Collected samples of suspect ACM for

laboratory analysis. Provided report to owner with findings and compliance requirements.

<u>Asbestos Inspection, Gas Station/Residence</u> <u>Property, Adrian</u>

Inspector of asbestos hazards at property consisting of gasoline station, retail store and residence in Adrian. Collected samples of suspect ACM for



laboratory analysis. Provided report to owner with findings and compliance requirements.

Asbestos Inspection, Former Restaurant, Ann Arbor Inspector and manager of asbestos hazards in former restaurant building slated for rehabilitation. Provided information and findings to architects assessing alternative approaches to re-habilitation of the building.

Asbestos Inspection, Former Celery Processing Plant

Inspector of industrial structure for suspect ACMs. Collected samples of suspect ACM for laboratory analysis. Provided report and assisted client with compliance requirements.

Asbestos Inspection, Overnight Courier's Building, <u>Troy, Michigan</u>

Inspector of facility to determine whether ACM was present and required remediation. Collected samples, reviewed laboratory analysis and provided client a report of methods and findings.

<u>Asbestos Inspection, Dearborn Manufacturing</u> Facility

Inspector of hot tub manufacturing facility to determine the presence and condition of ACM. Collected samples, reviewed laboratory analysis and provided client a report of methods and findings.

SITE ASSESSOR PROJECTS

<u>Phase I Environmental Site Assessment, Proposed</u> MSHDA Project

Inspector of vacant property in Battle Creek proposed for tax-credit development under Michigan State Housing and Development Authority. Investigation included desktop noise prediction at proposed building's exterior and wetland delineation by project team. Provided report ahead of deadline for submittal to MSHDA.

Phase I ESA, 100 Scattered Lots, MSHDA Project Inspector of vacant property in East Detroit proposed tax-credit development under Michigan State Housing & Development Authority. Investigation included property inspections and review of federal, state and municipal records. Provided report by MSHDA 2002 deadline.

Phase I ESA, Apartment Complex, Oakland County Inspector of apartment complex; analyzed architectural drawings to identify types of units and inspected representative sample. Reviewed all federal, state and local information on the property and submitted report to prospective purchaser.

<u>Phase I ESA and Limited, Subsurface Investigation,</u> Proposed MSHDA Project

Inspector of 29 parcels vacant and improved property in Highland Park proposed for tax-credit development under Michigan State Housing & Development Authority. Provided report ahead of deadline for submittal to MSHDA for March 2002 review and approval.

Phase I ESA, Apartment Complex, Wayne County Inspector of apartment complex; analyzed architectural drawings to identify types of units and inspected representative sample. Reviewed all federal, state and local information on the property and submitted report to prospective purchaser.

Phase I ESA, Mini Storage Facility, Pennsylvania
Assessed condition of mini-storage facility for prospective purchaser seeking financing.
Completed report according to ASTM standard within deadline.

<u>Phase I ESA, Former Consolidated, Frieghtways</u> Facility

Inspector of shipping and transfer facility with repair shop and fuel dispensing. Identified Recognized Environmental Conditions for purchaser.

Phase I ESA, Apartment Complex, Genesee County Inspector of apartment complex; review of architectural drawings to identify types of units and inspected representative sample. Assessor reviewed all federal, state and local information on the property and submitted report to prospective purchaser.

<u>Phase I ESA, 300 Acres Vacant Land, Holly, Michigan</u>

Inspected 300 acres of vacant land and produced Phase I report within three weeks to meet client deadline for financing.

<u>Phase I ESA, Mini Storage/Self Storage, Facility, Michigan</u>

Assessed condition of self-storage facility for prospective purchaser seeking financing. Completed report according to ASTM standard within deadline.

Phase I ESA, West Bloomfield Parks & Recreation Department

Assessed condition of vacant land to meet Department's procedures for property acquisition. Completed report according to ASTM standard within deadline.



Phase I ESA, Machining/Grinding Facility, Chelsea, Michigan

Assessed condition of industrial facility formerly used for machining and grinding. Identified RECs due to use of machining and cutting fluids. Assisted prospective purchaser seeking financing.

Asbestos Management, Washtenaw County Road Commission

Inspected residence obtained in right-of-way acquisition for asbestos. Collected samples for laboratory analysis. Provided report of federal and state requirements for removal for scheduled fire department burn exercise.

<u>Asbestos Inspection, Crestview Apartments,</u> Fenton, Michigan

Inspector of asbestos hazards at apartment property in Fenton. Collected samples of suspect ACM for laboratory analysis. Provided report to owner with findings and compliance requirements.

<u>Asbestos Inspection, Gas Station/Apartments,</u> Fenton, Michigan

Inspector of asbestos hazards at property consisting of gasoline station, retail store and residence in Adrian. Collected samples of suspect ACM for laboratory analysis. Provided report to owner with findings and compliance requirements.

<u>Asbestos Inspection, Former Restaurant, Ann Arbor, Michigan</u>

Inspector and manager of asbestos hazards in former restaurant building slated for rehabilitation. Provided information and findings to architects assessing alternative approaches to re-habilitation of the building.

Asbestos Inspection, Former Celery Processing Plant

Inspector of industrial structure for suspect ACMs. Collected samples of suspect ACM for laboratory analysis. Provided report and assisted client with compliance requirements.

Asbestos Inspection, Overnight Courier's Building, Troy, Michigan

Inspector of facility to determine whether ACM was present and required remediation. Collected samples, reviewed laboratory analysis and provided client a report of methods and findings.

Asbestos Inspection, Dearborn Manufacturing Facility

Inspector of hot tub manufacturing facility to determine the presence and condition of ACM. Collected samples, reviewed laboratory analysis and provided client a report of methods and findings.



APPENDIX G

Additional Records Seller's Questionnaire



ASTI Environmental Phase I ESA

| | | QUESTIONNAIRE | 7 |
|-----------------------------|---------------|---------------|----------|
| Respondent Name: JOHA | O WIRTZ Signa | ture: John | 2. Weitz |
| Time of Association with th | | | 0 |
| Date: 5.1.14 | | | |
| Phone Number and/or Emai | I Address: | | |
| Subject Property Address: | 2654 20th St | Post Huson | m1 48060 |
| | | | |

Please answer all questions to the best of your knowledge and in good faith.

| Question | | Resp | oonse | Comment (Please provide for Yes responses) |
|----------|--|------|-------|--|
| | | Yes | No | (Freder Provide for Fee Personals) |
| 1 | Is the Property currently used for manufacturing or industrial use? | | | Used for light assembly & welding |
| 2 | Is an adjacent property currently used for manufacturing or industrial use? | | | 0 0 |
| 3 | Has the property or adjoining property been used for manufacturing or industrial purposes in the past? | | | |
| 4 | To the best of your knowledge, has the property been used as a gas station, motor repair facility, print shop, dry cleaner, photo lab, junkyard, recycling facility, or landfill? | | D | |
| 5 | To the best of your knowledge, has an adjacent property been used as a gas station, motor repair facility, print shop, dry cleaner, photo lab, junkyard, recycling facility, or landfill? | | V | |
| 6 | Are there any pesticides, herbicides, automotive or industrial batteries, paints or other chemicals stored on the property (exclude those <5 gallons unless in large quantities of >25 gallons total)? | | 1 | |
| 7 | Have pesticides, herbicides, or other agricultural chemicals been stored, mixed, or applied to the property? | | M | |
| 8 | Are there any plastic or metal drums (typically 55-gallon) located on the property? | | 1 | |
| 9 | Has fill dirt from an offsite source been placed on the property that may be contaminated or from an unknown source? | | N | |
| 10 | Has any construction debris, substances identified as hazardous substances, unidentified wastes, tires, batteries, or other wastes been dumped above grade, buried, or burned at the property? | | N | |
| 11 | Is there any soil on the property that has been obviously stained? | | 1 | |
| 12 | Does the property discharge waste water, on or adjacent to the property, other than storm water into a sewer system or retention/detention pond? | | V | |
| 13 | Is the property served by a private well or non-public water system? Include potable and irrigation wells. | | V | |
| 14 | Do you know of former water (potable or irrigation) wells associated with the property? | | 7 | |
| 15 | Is there currently or has there been in the past a septic system for the property? | | V | |
| 16 | Are there or have there been in the past any pits, ponds, or lagoons associated with waste treatment or disposal on the property? | | 1 | |

| Question | | Resp | oonse | Comment (Please provide for Yes responses) |
|----------|--|------|-------|--|
| | | Yes | No | (Floude provide for responses) |
| 17 | Are there storage tanks, above ground or underground, located on the property? | | 7 | |
| 18 | In the past, have there been storage tanks, above ground or underground, located on the property? | | 7 | |
| 19 | Have polychlorinated biphenyls (PCBs) been used in electrical transformers, capacitors, or other equipment at the property? | | A | |
| 20 | Is there a transformer on the property that is not owned by a public or private utility company for which there are no records indicating the absence of PCBs? | | 7 | |
| 21 | Do you have any knowledge of environmental liens or government notification relating to past or recurrent violations of environmental laws with respect to the property? | | D | |
| 22 | Are there currently or have there been in the past any floor drains, sumps, and/or oil-water separators on the property? | | | hone known |
| 23 | If yes, to question 22, do the drains/sumps discharge to the sewer system? | | | |
| 24 | Are you aware of the presence of asbestos-containing materials? | | 7 | |
| 25 | Are you aware of the presence of lead-based paint? | | 7 | |
| 26 | Is there an asbestos and/or lead-based paint Operations & Maintenance Program in place? | | 7 | |
| 27 | Has the water ever been tested for lead? | | V | |
| 28 | Has radon testing ever been conducted? | | 7 | |
| 29 | Is there now or has there been evidence of mold or mildew present? | | 7 | |
| 30 | Are there any prior environmental investigations (Phase I ESAs, Phase II ESAs, geotechnical reports, remedial reports, etc.) available? | | V | |
| 31 | Please provide a brief description of the historical use of the property including construction dates, past operations, former buildings, etc. | Plea | ise s | ee attached City Card |

ASTI Environmental - Fax Number 810-225-3800 Phone Number 810-225-2800

ECF Neighborhood Code:

5-06 - 5-06 INDUSTRIAL PARK

Legal Information for 06-182-0047-000 [collapse]

N 250 FT OF S 850 FT OF E 634.61 FT OF W 667.61 OUTLOT A ASSESSOR'S TWENTY-FOURTH STREET PLAT

Sales Information

| 0 sale record(s) found. | | | | | | | | | | |
|-------------------------|------------|------------|---------|---------|---------------|------------|--|--|--|--|
| Sale Date | Sale Price | Instrument | Grantor | Grantee | Terms Of Sale | Liber/Page | | | | |

Building Information

| 3 building(s) found. | | | | | | | |
|--|---------------|----------|-----------|--|--|--|--|
| Description | Floor Area | Yr Built | Est. TCV | | | | |
| ■ Commercial/Industrial Building 1 - Office Building | 2400 Sq. Ft. | 1991 | \$98,887 | | | | |
| Commercial/Industrial Building 2 - Industrial, Light Manufacturing | 14600 Sq. Ft. | 1967 | \$170,653 | | | | |
| Commercial/Industrial Building 3 - Industrial, Light Manufacturing | 6600 Sq. Ft. | 1994 | \$158,067 | | | | |

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ASTI ENVIRONMENTAL

8,000 Environmental Investigation, Remediation, Compliance and Restoration Projects Throughout The Great Lakes Since 1985.

OUR SERVICES INCLUDE:

- ASBESTOS, LEAD, MOLD, AND RADON ASSESSMENTS
- BROWNFIELD/GREYFIELD REDEVELOPMENT STRATEGIES
- DEVELOPMENT INCENTIVES
- ECOLOGICAL ASSESSMENTS AND RESTORATION
- Environmental Assessments and Impact Statements
- Environmental Opportunities Assessment
- GIS MAPPING
- HAZARD MITIGATION PLANNING
- MINING AND RECLAMATION ASSISTANCE
- OPERATION AND MAINTENANCE
- Phase I ESA and Environmental Due Diligence
- REGULATORY COMPLIANCE AND PERMITTING
- Soil and Groundwater Assessments
- Soil and Groundwater Remediation
- STORAGE TANK COMPLIANCE AND CLOSURE
- THREATENED AND ENDANGERED SPECIES SURVEYS
- Watershed and Stormwater Management Programs
- WETLAND DELINEATION, PERMITTING, MITIGATION AND BANKING



6. REFERENCES

Phase II Environmental Site Assessment, Chester Limited III, LLC, 2654 20th Street, Port Huron, Michigan; Envirologic, July 10, 2014.



PHASE II ENVIRONMENTAL SITE ASSESSMENT

OF

CHESTER LIMITED III, LLC 2654 20TH STREET PORT HURON, MICHIGAN

JULY 10, 2014

PREPARED FOR:

CHESTER LIMITED III, LLC 2605 HIGHWINDS LANE OAKLAND, MICHIGAN 48636

WITH SUPPORT FROM:

ST. CLAIR COUNTY BROWNFIELD REDEVELOPMENT AUTHORITY
200 GRAND RIVER, SUITE 202
PORT HURON, MICHIGAN

Prepared by:

ENVIROLOGIC TECHNOLOGIES, INC.

2960 Interstate Parkway Kalamazoo, Michigan 49048 (269) 342-1100

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| Investigation of Potential Offsite Groundwater Contamination and pVEC | |
| Investigation of Former Outdoor Material Storage | |
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APPENDICES

APPENDIX A: Site Figures
APPENDIX B: Soil Boring Logs

APPENDIX C: Fibertec Environmental Services, Inc., Laboratory Reports
APPENDIX D: GSI and GSI Protection Criteria Calculation Spreadsheet

APPENDIX E: Data Validation Report



PHASE II ENVIRONMENTAL SITE ASSESSMENT OF CHESTER III LIMITED, LLC 2654 20TH STREET PORT HURON, MICHIGAN

INTRODUCTION AND BACKGROUND

On May 21, 2014 ASTI Environmental (ASTI) completed a Phase I Environmental Site Assessment (ESA) of a property identified as Chester Limited III, LLC located at 2654 20th St., Port Huron, Michigan (Parcel #: 06-182-0047-000). The Phase I ESA identified the following Recognized Environmental Concerns (RECs):

- The subject building was constructed in 1967 and used as a stamping facility through 1973 that cooled rolled steel in quenching oil. The storage, handling, and disposal practices related to the quenching oil are not known and machine pits may have been present.
- The north portion of the original shop including the AC room and area east to the
 addition contained several foundation scars; the result of machining operations.
 Significant staining was present in one area entering a cracked area in the foundation.
 The foundation breaches and staining represent a REC.
- The compressor room was heavily stained and staining was noted on the east exterior wall of the room.
- A groundwater plume containing metals and solvents was identified to the south of the
 property. Solvent soil impacts were also identified to the east of the property. These
 impacts are the result of former automotive parts manufacturing on the south adjoining
 1721 Dove St. and east adjoining 2655 16th St. sites. The extent of the groundwater
 plume is not known and the identified offsite impacts also represent a pVEC (potential
 vapor encroachment condition).

Envirologic initiated and completed a Phase II ESA in order to evaluate the identified RECs.

FIELD ACTIVITIES

In order to characterize site conditions relative to the RECs identified in the Phase I ESA, Envirologic initiated and completed Phase II ESA activities on June 18 and 19, 2014. Prior to the initiation of the field activities, Envirologic secured utility clearance by contacting the Michigan one-call utility locating service (MISSDIG).

Six direct-push soil borings and three temporary monitoring wells were installed in order to investigate soil and groundwater conditions that may have been affected by the historic operation of a stamping facility and offsite concerns.

All soil borings were advanced by a GeoProbe 66DT equipped with two-inch-diameter macrocores. At soil boring locations inside the main building, Envirologic used a four-inch-diameter diamond-tipped core barrel to bore through foundation concrete. All soil borings except GSB-5 and GSB-6 were advanced to a final depth of 10 feet below ground surface (bgs). GSB-5 was advanced to five feet bgs; GSB-6 to 3.5 feet bgs. An Envirologic Field Geologist characterized and field screened soils on a continuous basis from PVC macrocore liners. Soils were field screened for organic vapors using a photoionization detector (PID).

Three temporary monitoring wells were installed throughout the vacant, eastern portion of the property. Temporary monitoring wells were installed by the GeoProbe 66DT, and constructed of one-inch diameter PVC riser casing, and one-inch diameter PVC 10-slot well screens. Temporary monitoring wells were positioned across the groundwater surface as observed during boring installation. Clean sand was placed around the well screen and the remaining annulus was sealed with hydrated bentonite. In order to allow subsurface conditions to stabilize following boring installation, temporary monitoring wells were sampled the following day. Following the collection of groundwater samples, temporary monitoring wells were abandoned, and borings were backfilled with hydrated bentonite. Refer to Appendix B for soil boring logs.

Soils encountered during boring installation were similar in type and depth throughout the site. At indoor boring locations (GSB-5 and GSB-6), six inches of foundation concrete was cored through before soils were encountered. Beneath foundation concrete, sandy construction fill material was encountered to the base of the boring. At the remaining boring locations, typically three inches of topsoil was encountered at the surface. Beneath the top soil, sand with varying amounts of silt and clay was encountered until the base of the boring. Groundwater saturation was encountered between five and 7.5 feet bgs.

Based on previous site use history, soil samples were collected for analysis of a wide range of parameters: volatile organic compounds (VOCs, USEPA Method 8260+), semi-volatile compounds (PNAs, USEPA Method 8270), and Michigan 10 metals. Soil sampling procedures for VOCs was completed utilizing USEPA Method 5035. Groundwater samples were collected for analysis of VOCs (USEPA Method 8260+) only. All boring locations were backfilled with native soil. A summary of field activities and observations is presented in the following sections.

Investigation of Stained and Breached Foundation Concrete

During the Phase I site inspection conducted by ASTI on May 6, 2014, areas of stained foundation concrete were observed. In some areas, the floor underlying the stained areas was cracked. Soil boring locations of GSB-5 and GSB-6 were selected based on the severity of staining and access for sampling.

After the concrete was cored, both GSB-5 and GSB-6 were advanced using a hand auger. Soil boring GSB-5 was advanced to a total depth of five feet bgs; soil boring GSB-6 was advanced to a total depth of 3.5 feet bgs. No evidence of impact (visual, olfactory, PID response) was observed at either location. Soil samples were collected at two feet bgs at GSB-5 and GSB-6. Soil samples were collected from each boring at two feet bgs.

Significant staining was observed on the concrete in the compressor room inside the building. Staining was also observed on soils immediately north of the compressor room, outside of the building. Soil boing GSB-4 was advanced immediately north of the building, at the stained soil (refer to Appendix A, Site Plan). Although significant staining was observed on the concrete, no impact (visual, olfactory, PID responses) was observed on subgrade soils at GSB-4. A soil sample was collected at two feet bgs.

Borings were backfilled with native soil and patched with concrete after sampling activities were completed.

Investigation of Potential Offsite Groundwater Contamination and pVEC

Previous environmental investigations identified a groundwater plume containing chlorinated solvents and metals at the south and east adjacent properties (1721 Dove St. and 2655 16th St.). The extent of the groundwater plume is not known, and may extend onto the subject property. Thus, the offsite groundwater plume represents a pVEC for the subject property. Temporary monitoring wells TMW-1, TMW-2, and TMW-3 were installed across the vacant, eastern portion

of the subject property in order to evaluate the potential for vapor encroachment and the extent of offsite migration (refer to Appendix A, Site Plan).

Soil borings TMW-1, TMW-2, and TMW-3 were advanced to a total depth of 10 feet bgs. Groundwater was encountered between five and seven feet bgs at the time of boring installation. At temporary monitoring wells TMW-1 and TMW-2 well screens were installed from four to nine feet. Temporary monitoring well TMW-3 was screened from five to 10 feet bgs. At TMW-1, a moderate petroleum odor, petroleum sheen, and black staining were observed in soils just above and below the water table. A PID response of 5.6 parts per million (ppm) corresponded to the impacted area. Petroleum impact (visual, olfactory, PID) was not observed in soils deeper than eight feet bgs. At TMW-2, a slight petroleum odor was observed with saturated soils. A PID response of 1.8 ppm corresponded to the saturated soils with a slight petroleum odor. No impact was observed (visual, olfactory, PID response) was observed at TMW-3.

Groundwater samples were collected the day following temporary monitoring well installation. Static water levels were measured prior to purging each well. Depth to groundwater was between 5.26 and 6.35 feet, measured relative to monitoring well top of casing. Groundwater was purged from each well until it appeared clear. Stabilization parameters including temperature, specific conductivity, pH, oxidation reduction potential (ORP), and turbidity were recorded prior to sample collection. Groundwater samples were collected for analysis of VOCs, (USEPA method 8260+). Groundwater samples were collected in laboratory prepared 40-mL vials preserved hydrochloric acid and placed on ice.

During groundwater stabilization, no impact was observed (visual, olfactory) at any of the temporary monitoring wells.

Investigation of Former Outdoor Material Storage

Historic aerial photographs from 2005 to 2010 show evidence of miscellaneous storage along the southern property boundary. Soil borings GSB-1, GSB-2, and GSB-3 were advanced in the grassy area south of the paved parking lot, and north of the southern property fence in order to investigate potential hazardous substance impact related to outdoor storage (refer to Appendix A, Site Plan).

Soil borings GSB-1, GSB-2, and GSB-3 were advanced to a total depth of 10 feet bgs. No impact (visual, olfactory, PID responses) was observed at GSB-1, GSB-2, or GSB-3.' Soil samples were collected from each boring location at two feet bgs.

LABORATORY ANALYTICAL RESULTS

Soil and groundwater samples were submitted to Fibertec Environmental Services, Inc. of Holt, Michigan for laboratory analysis. The sample containers were placed into a chilled cooler for transportation to the laboratory using standard chain-of-custody procedures.

The laboratory analytical results for soil and groundwater samples are summarized in Table 1 and Table 2, respectively, along with comparisons to the Generic Residential Cleanup Criteria (GRCC), which were obtained from *MDEQ Remediation Division Revised Part 201 Cleanup Criteria*, December 30, 2013. The laboratory analytical report and a copy of the chain of custody are presented in Appendix D. Based upon the identified site use history and previous sampling results, soil samples were analyzed for VOCs (USEPA Method 8260+), PNAs (USEPA Method 8270), and Michigan 10 Metals.

In order to evaluate the possibility of a pVEC, groundwater analytical results were compared to Residential Vapor Intrusion Screening Levels set forth in the MDEQ *Guidance Document for the Vapor Intrusion Pathway, Appendix D*. Vapor Intrusion Screening Levels were used for criteria comparison in place of the Residential Groundwater Volatilization to Indoor Air Inhalation Criteria (GVIIC) because assumptions made in the development of GVIIC (i.e., depth to groundwater <3 meters bgs [approximately 10 feet]) were not met by site conditions.

Some generic chemical-specific Groundwater Surface Water Interface (GSI) criterion depends on the pH or water hardness, or both, of the receiving surface water. MDEQ Remediation and Redevelopment Division (RRD) *Operational Memorandum No. 5 for the Groundwater Surface Water Interface* provides a spreadsheet for calculating GSI and GSI protection criteria based on the hardness and/or pH of the receiving surface water. *Operational Memorandum No. 5* establishes a default hardness value of 150 mg/l for southern Lower Peninsula surface waters. The calculations for GSI and GSI protection criteria are attached following the report in Appendix D. The final GSI and GSI protection criteria values are included in analytical summary Tables 1 and 2.

Table 1 – Summary of Soil Analytical Results

| | | | | Tab | ie 1 – Summe | ary or son F | Miaiyucai | Nesuits | | | | | | | |
|-----------------------------|---|---|--|---|---|-------------------------------|--|--|---|---|---|---|---|---|-------------------|
| Hazardous Substance | Chemical Abstract Service Number | Statewide Default Background Level | Residential Drinking Water Protection Criteria | Groundwater Surface Water Interface Protection Criteria | Particulate Soil Inhalation Criteria | Direct Contact Criteria | GSB-1 @2' | GSB-2 @2' | GSB-2 @2' Lead, Fine Fraction | GSB-2 @2' Lead, Coarse Fraction | GSB-2 @2' Lead, Total (calculated) | GSB-3 @2' | GSB-4 @2' | GSB-5 @2' | GSB-6 @2' |
| Metals | <u> </u> | | | | <u> </u> | <u> </u> | | | | | | <u> </u> | | <u> </u> | |
| Arsenic | 7440382 | 5,800 | 4,600 | 4,600 | 7.20E+05 | 7,600 | 1,400 | 9,400 | NA | NA | NA | 910 | 1,800 | 2,100 | 600 |
| Barium (B) | 7440393 | 75,000 | 1.30E+06 | 4.4E+5 (G) | 3.30E+08 | 3.70E+07 | 29,000 | 500,000 | NA | NA | NA | 11,000 | 34,000 | 30,000 | 6,400 |
| Cadmium (B) | 7440439 | 1,200 | 6,000 | 3,000 (G,X) | 1.70E+06 | 5.50E+05 | 240 | 4,200 | NA | NA | NA | 82 | 160 | 310 | <50 |
| Chromium (III) (B,H) | 16065831 | 18,000 (total) | 1.0E+9 (D) | 3.0E+9 (G,X) | 3.30E+08 | 7.90E+08 | 3,800 | 23,000 | NA | NA | NA | 3,800 | 4,400 | 6,000 | 3,600 |
| Copper (B) | 7440508 | 32,000 | 5.80E+06 | 73,000 (G) | 1.30E+08 | 2.00E+07 | 20,000 | 170,000 | NA | NA | NA | 6,100 | 15,000 | 24,000 | 1,900 |
| Lead (B) | 7439921 | 21,000 | 7.00E+05 | 2.5E+6 (G,X) | 1.00E+08 | 4.00E+05 | 20,000 | 770,000 | 671,000 | 560,000 | 615,000 | 7,500 | 21,000 | 41,000 | 1,200 |
| Selenium (B) | 7782492 | 410 | 4,000 | 400 | 1.30E+08 | 2.60E+06 | 220 | 1,300 | NA | NA | NA | <200 | <200 | 330 | <200 |
| Silver (B) | 7440224 | 1,000 | 4,500 | 100 (M); 27 | 6.70E+06 | 2.50E+06 | <100 | 1000 | NA | NA | NA | <100 | <100 | <100 | <100 |
| Zinc (B) | 7440666 | 47,000 | 2.40E+06 | 1.7E+5 (G) | ID | 1.70E+08 | 27,000 | 1,000,000 | NA | NA | NA | 14,000 | 30,000 | 62,000 | 7,000 |
| Mercury (Total) (B,Z) | Varies | 130 | 1,700 | 50 (M); 1.2 | 2.00E+07 | 1.60E+05 | <50 | 690 | NA | NA | NA | <50 | <50 | 66 | <50 |
| VOCs | | | | | • | | | | | | | | | | |
| 1,4-Dichlorobenzene | 106467 | NA | 1,700 | 360 | 4.50E+08 | 4.00E+05 | <120 | 2,200 | NA | NA | NA | <110 | <110 | <110 | <100 |
| All other VOCs | NA | NA | NA | NA | NA | NA | <rl< td=""><td><rl< td=""><td>NA</td><td>NA</td><td>NA</td><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""></rl<></td></rl<></td></rl<></td></rl<></td></rl<></td></rl<> | <rl< td=""><td>NA</td><td>NA</td><td>NA</td><td><rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""></rl<></td></rl<></td></rl<></td></rl<></td></rl<> | NA | NA | NA | <rl< td=""><td><rl< td=""><td><rl< td=""><td><rl< td=""></rl<></td></rl<></td></rl<></td></rl<> | <rl< td=""><td><rl< td=""><td><rl< td=""></rl<></td></rl<></td></rl<> | <rl< td=""><td><rl< td=""></rl<></td></rl<> | <rl< td=""></rl<> |
| PNAs | | | | | • | | | | | | | | | | |
| Acenaphthene | 83329 | NA | 3.00E+05 | 8,700 | 1.40E+10 | 4.10E+07 | 2,500 | <330 | NA | NA | NA | <330 | <330 | <330 | <330 |
| Acenaphthylene | 208968 | NA | 5,900 | ID | 2.30E+09 | 1.60E+06 | 700 | <330 | NA | NA | NA | <330 | <330 | <330 | <330 |
| Anthracene | 120127 | NA | 41,000 | ID | 6.70E+10 | 2.30E+08 | 4,400 | <330 | NA | NA | NA | <330 | <330 | <330 | <330 |
| Benzo(a)anthracene (Q) | 56553 | NA | NLL | NLL | ID | 20,000 | 8,200 | 650 | NA | NA | NA | <330 | <330 | 390 | <330 |
| Benzo(a)pyrene (Q) | 50328 | NA | NLL | NLL | 1.50E+06 | 2,000 | 8,500 | 500 | NA | NA | NA | <330 | <330 | <330 | <330 |
| Benzo(b)fluoranthene (Q) | 205992 | NA | NLL | NLL | ID | 20,000 | 10,000 | 860 | NA | NA | NA | <330 | <330 | 800 | <330 |
| Benzo(g,h,i)perylene | 191242 | NA | NLL | NLL | 8.00E+08 | 2.50E+06 | 5,100 | 480 | NA | NA | NA | <330 | <330 | <330 | <330 |
| Benzo(k)fluoranthene (Q) | 207089 | NA | NLL | NLL | ID | 2.00E+05 | 3,600 | <330 | NA | NA | NA | <330 | <330 | <330 | <330 |
| Chrysene (Q) | 218019 | NA | NLL | NLL | ID | 2.00E+06 | 7,400 | 660 | NA | NA | NA | <330 | <330 | <330 | <330 |
| Dibenzo(a,h)anthracene (Q) | 53703 | NA | NLL | NLL | ID | 2,000 | 1,400 | <330 | NA | NA | NA | <330 | <330 | <330 | <330 |
| Fluoranthene | 206440 | NA | 7.30E+05 | 5,500 | 9.30E+09 | 4.60E+07 | 19,000 | 1,300 | NA | NA | NA | <330 | <330 | 1,000 | <330 |
| Fluorene | 86737 | NA | 3.90E+05 | 5,300 | 9.30E+09 | 2.70E+07 | 2,600 | <330 | NA | NA | NA | <330 | <330 | <330 | <330 |
| Indeno(1,2,3-cd) pyrene (Q) | 193395 | NA | NLL | NLL | ID | 20,000 | 5,500 | 430 | NA | NA | NA | <330 | <330 | 370 | <330 |
| 2-Methylnaphthalene | 91576 | NA | 57,000 | 4,200 | 6.70E+08 | 8.10E+06 | 1,800 | 600 | NA | NA | NA | <330 | <330 | <330 | <330 |
| Phenanthrene | 85018 | NA | 56,000 | 2,100 | 6.70E+06 | 1.60E+06 | 17,000 | 1,100 | NA | NA | NA | <330 | <330 | 900 | <330 |
| Pyrene | 129000 | NA | 4.80E+05 | ID | 6.70E+09 | 2.90E+07 | 16,000 | 1,200 | NA | NA | NA | <330 | <330 | 1,300 | <330 |

Notes for Table 1 – Summary of Soil Analytical Results

- 1. All Criteria, unless otherwise noted, are expressed in units of parts per billion (ppb). One ppb is equivalent to 1 microgram per kilogram (µg/kg).
- 2. Results bolded were detected, bolded and shaded where exceeding cleanup criteria
- 3. (B) = Background, as defined in R 299.1(b), may be substituted if higher than the calculated cleanup criterion. Background levels may be less than criteria for some inorganic compounds.
- (D) = Calculated criterion exceeds 100 percent, hence it is reduced to 100 percent or 1.0E+9 parts per billion (ppb).
- (G) = GSI criterion depends on the pH or water hardness, or both, of the receiving surface water.
- (H) = Valence-specific chromium data (Cr III and Cr VI) shall be compared to the corresponding valence-specific cleanup criteria.
- (M) = Calculated criterion is below the analytical target detection limit, therefore, the criterion defaults to the target detection limit.
- (Q) = Criteria for carcinogenic polycyclic aromatic hydrocarbons were developed using relative potential potencies to benzo(a)pyrene
- (X) = The GSI criterion shown in the generic cleanup criteria tables is not protective for surface water that is used as a drinking water source.
- (Z) = Mercury is typically measured as total mercury. The generic cleanup criteria, however, are based on data for different species of mercury [...] Comparison to criteria shall be based on species-specific analytical data only if sufficient facility characterization has been conducted to rule out the presence of other species of mercury.
- "ID" means insufficient data to develop criterion.
- "NA" means a criterion or value is not available or, in the case of background and CAS numbers, not applicable.
- "NLL" means hazardous substance is not likely to leach under most soil conditions.
- "NLV" means hazardous substance is not likely to volatilize under most conditions.
- 4. Cleanup Criteria from Michigan DEQ Remediation Division, Revised Part 201 Cleanup Criteria and Part 213 Risk-based Screening Levels, Attachment, December 31, 2013

Table 2 - Summary of Groundwater Analytical Results

| Hazardous Substance | Chemical Abstract Service Number | Residential Drinking Water Criteria | Groundwater Surface Water Interface Criteria | Residential Groundwater Volatilization to Indoor Air Inhalation Criteria | Vapor Intrusion Groundwater Screening Levels GW _{VI-res} | TMW-3@5-10' | TMW-2@4-9' | TMW-1@4-9' |
|---------------------|---|--|--|---|--|---|---|-------------------|
| Benzene (I) | 71432 | 5.0 (A) | 200 (X) | 5,600 | 27 | <1.0 | 3.2 | <1.0 |
| Chlorobenzene (I) | 108907 | 100 (A) | 25 | 2.10E+05 | 1,100 | 1.1 | 68 | <1.0 |
| 1,4-Dichlorobenzene | 106467 | 75 (A) | 17 | 16,000 | 76 | <1.0 | 8.8 | <1.0 |
| All other VOCs | NA | NA | NA | NA | NA | <rl< td=""><td><rl< td=""><td><rl< td=""></rl<></td></rl<></td></rl<> | <rl< td=""><td><rl< td=""></rl<></td></rl<> | <rl< td=""></rl<> |

Notes:

- 1. All Criteria, unless otherwise noted, are expressed in units of parts per billion (ppb). One ppb is equivalent to 1 microgram per kilogram (µg/kg).
- 2. Results **bolded** were detected, **bolded and shaded** where exceeding cleanup criteria
- 3. (A) = Criterion is the state of Michigan drinking water standard established pursuant to Section 5 of 1976 PA 399, MCL 325.1005.
- (I) = Hazardous substance may exhibit the characteristic of ignitability as defined in 40 C.F.R. §261.21 (revised as of July 1, 2001)
- (S) = Criterion defaults to the hazardous substance-specific water solubility limit.
- (X) = The GSI criterion shown in the generic cleanup criteria tables is not protective for surface water that is used as a drinking water source.
- "NA" means a criterion or value is not available or, in the case of background and CAS numbers, not applicable
- 4. Cleanup Criteria from Michigan DEQ Remediation Division, Revised Part 201 Cleanup Criteria and Part 213 Risk-based Screening Levels, Attachment, December 31, 2013
- $5.\ Vapor\ Intrusion\ Groundwater\ Screening\ Levels\ (GW_{VI-res})\ from\ Appendix\ D\ of\ the\ MDEQ\ \textit{Guidance\ Document\ for\ the\ Vapor\ Intrusion\ Pathway}$



Soil Analytical Results

Soil borings GSB-1, GSB-2, and GSB-3 were installed along the southern property boundary in order to evaluate subsurface conditions possibly affected by miscellaneous storage of unidentified materials.

In soil sample GSB-1@2' PNA target compound benzo(a)pyrene exceeded Direct Contact Criteria and phenanthrene exceeded Groundwater Surface Water Interface Criteria. Several metals were identified above their method detection limits, however, none exceeded GRCC. No VOC target compounds were identified above the laboratory reporting limits.

Analytical results of soil sample GSB-2@2' identified several metals in excess of Residential Drinking Water Protection Criteria, Groundwater Surface Water Interface Protection Criteria, Direct Contact Criteria, or all three. In order to evaluate direct contact exposure for lead, laboratory analysis was performed on the "fine fraction" (defined as particles less than 250 microns in size) of soil sample GSB-2@2'. Laboratory results of GSB-2@2' detected the "fine fraction" of lead in excess of Direct Contact Criteria. The concentration of arsenic in GSB-2@2' also exceeded Direct Contact Criteria.

No target compounds (metals, PNAs, VOCs) were identified above GRCC in soil sample GSB-3@2'.

Soil boring GSB-4 was installed just north and outside of the compressor room near an area where staining was identified. No target compounds (metals, PNAs, VOCs) were identified above generic Residential Cleanup Criteria in soil sample GSB-4@2'.

Soil borings GSB-5 and GSB-6 were installed inside the main building beneath areas where the foundation concrete was stained. In soil sample GSB-5@2', mercury was detected at a concentration greater than Groundwater Surface Water Interface Criteria. Several PNA target compounds were identified; however, none exceeded GRCC. No target compounds (metals, PNAs, VOCs) were identified above their laboratory reporting limits in soil sample GSB-6@2'.

Groundwater Analytical Results

Three temporary monitoring wells were installed throughout the vacant eastern area of the subject property in order to evaluate potential offsite migration of groundwater conditions and a pVEC. Groundwater samples were collected from temporary monitoring well TMW-1, TMW-2, and TMW-3. A review of Table 2 – Summary of Groundwater Analytical Results indicates that

that the following VOC target compounds were identified in at least one groundwater sample: benzene, chlorobenzene, and 1,4-dichlorobenzene.

Analytical results of groundwater sample TMW-2@4-9 indicates that benzene, chlorobenzene, and 1,4-dichlorobenzene were detected above laboratory reporting limits. Chlorobenzene was detected at a concentration exceeding the Groundwater Surface Water Interface Criteria.

Analytical results of groundwater sample TMW-2@5-10 detected chlorobenzene; however, the concentration did not exceed any residential cleanup criteria.

No VOC target compounds were identified above their laboratory reporting limits in groundwater sample TMW-1@4-9.

None of the VOC target compounds detected in groundwater exceeded their respective Vapor Intrusion Groundwater Screening Levels. Therefore, contaminants which have migrated onto the subject property identified in temporary monitoring well TMW-2 and TMW-3 do not present a potential Vapor Encroachment Condition.

CONCLUSIONS

Chlorobenzene and 1,4-dichnlorobenzene were detected in soil and groundwater samples at concentrations greater than generic Residential Cleanup Criteria. Chlorobenzne and 1,4-dichlorobenzne are chlorinated benzenes, a group of chemicals commonly used as industrial solvents. No evidence indicating the use of solvents was identified at the subject property in the Phase I ESA conducted by ASTI. Therefore the presence of 1,4-dichlorobenzene and chlorobenzene in soil and groundwater samples is presumably related to an offsite release.

The VOC target compounds identified in groundwater samples did not exceed Vapor Intrusion Groundwater Screening Levels. Therefore, VOC contaminants detected in TMW-2 and TMW-3, presumably from an offsite release, do not constitute a potential Vapor Encroachment Condition.

At soil sample GSB-2@2', contaminants including metals and VOCs were identified above Residential Drinking Water Protection Criteria, Groundwater Surface Water Interface Protection Criteria, and Direct Contact Criteria. These contaminants may be the result of the miscellaneous materials stored along the southern property boundary from at least 2005 – 2010.

Soil samples collected in the main building from areas beneath the stained concrete (GSB-5@2' and GSB-6@2') were not impacted by contaminants common to petroleum products. However, mercury was detected in soil sample GSB-5@2' at a concentrations exceeding Groundwater Surface Water Interface Protection Criteria. The staining observed north and outside of the compressor room does not appear to be impacted by contaminants common to petroleum products or metals.

Analytical data from soil and groundwater samples organized in Table 1 and Table 2 shows that 2654 20th Street (Parcel #: 06-182-0047-000) meets the definition of a "facility" as defined in Part 201 of NREPA. A party interested in redevelopment of the subject property may complete a Baseline Environmental Site Assessment (BEA) in order to provide liability protection against known contamination.

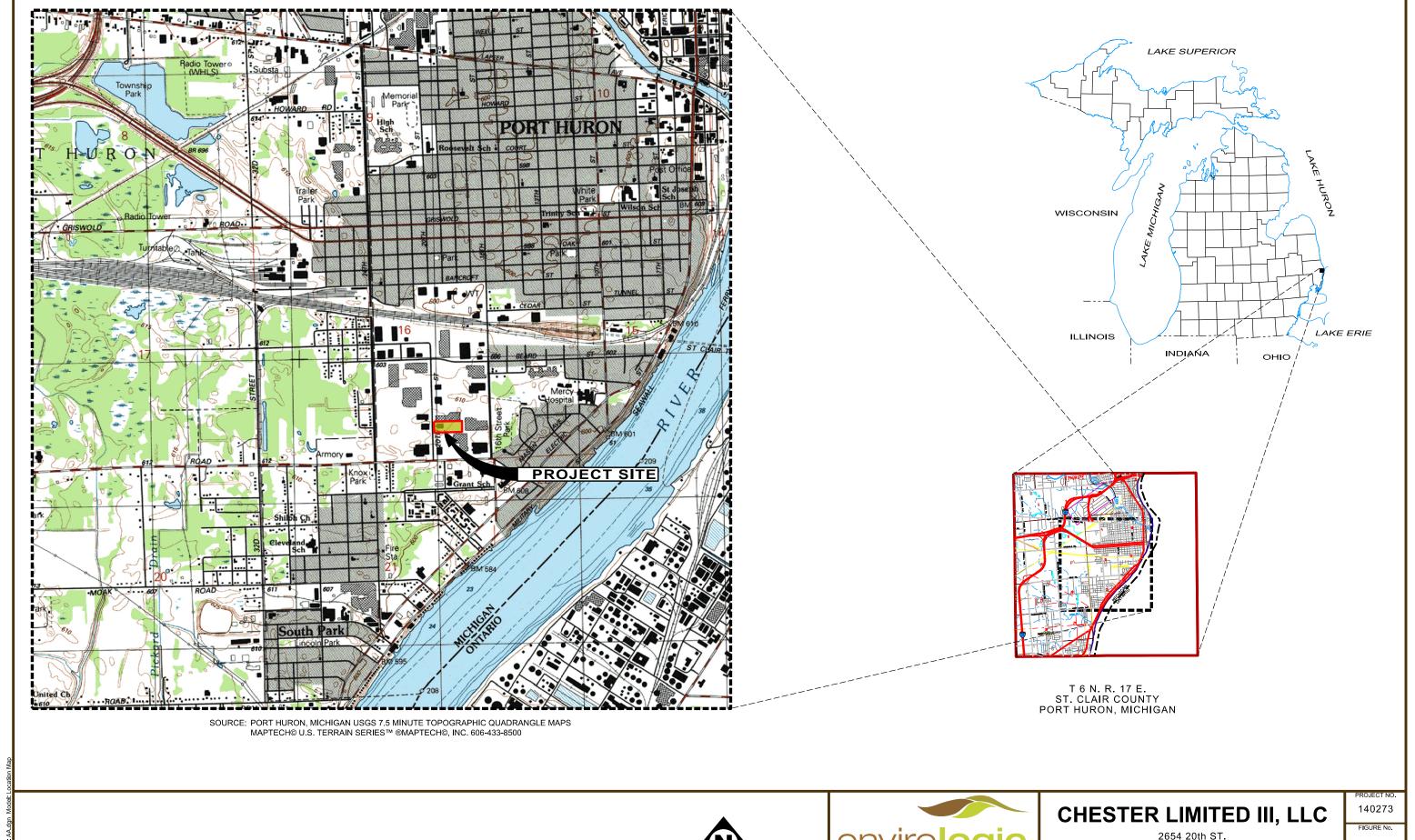
LIMITATIONS

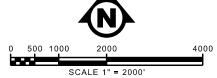
This Phase II Environmental Site Assessment was designed to identify and investigate specific environmental concerns in specific areas. Interpretations should not be made with respect to areas not addressed by this investigation. Conclusions should only be drawn from those areas where specific information was obtained. The results and conclusions of this study do not ensure, warrant or represent that there are not additional environmental issues that may be discovered if additional work is undertaken.

APPENDIX A

SITE FIGURES

Figure 1: Location Map
Figure 2: Site Plan with Boring Locations







2654 20th ST. PORT HURON, MI

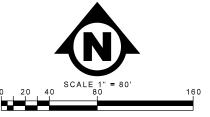
LOCATION MAP

1



LEGEND

- GEOPROBE SOIL BORING LOCATION
- TEMPORARY MONITORING WELL LOCATION



NOTE:
THIS IS NOT A PROPERTY BOUNDARY SURVEY, PROPERTY BOUNDARIES SHOWN ON THIS MAP
ARE BASED ON AVAILABLE FURNISHED INFORMATION AND ARE APPROXIMATE ONLY AND
SHOULD NOT BE USED TO ESTABLISH PROPERTY BOUNDARY LOCATION IN THE FIELD.

CHESTER LIMITED III, LLC 2654 20th ST PORT HURON, MI

SITE PLAN



140273 FIGURE No.

environmental consulting + services 2960 INTERSTATE PARKWAY KALAMAZOO, MICHIGAN 49048 PH: (269) 342-1100 FAX: (269) 342-4945

APPENDIX B

SOIL BORING LOGS



| | | LOG | OF | GSB-1 | | PAGE No: 1 |
|----------------|---|-----------------|------------|---|---|------------------------|
| 0 | nvirologic | CLIENT: | SCCBR | | | |
| | ronmental consulting + services | LOCATION: | | Limited III LLC, 2654 20th Stre | et, Port Huron, M | l |
| 2960 Inte | erstate Parkway oo, Michigan 49048 | DRILLING CO: | WMD | | START DATE: | 6/18/2014 |
| Ph: 269. | 342.1100 Fax: 269.342.4945 | GEOLOGIST: | RLW | | COMPLETION DATE: 0 | 06/18/2014 |
| PID READING | SAMPLING | SAMPLES Feet | SYMBOL | DES | SCRIPTION | |
| | | | | FILL - gravelly sand, bro poorly sorted, with fine t cinders from 0 - 1 feet, d | o medium gravel, | m grained, some |
| 0 | | | | SAND - brown, fine grair organic material, dry. | ned, well sorted, w | vith little |
| | | 5 | | SAND - light brown, very sorted, with some silt, d feet. | r fine to fine grain ry, damp at 6 feet, | ed, well wet at 7.5 |
| 0 | | | | | | |
| | | | | SAND - brownish gray, v sorted, with some silt, w | rery fine to fine gr | ained, well |
| | | 10 | | | | |
| | | | | TOTAL DEPTH = 10 FEE | I | |
| | | | | | | |
| | | | | | | |
| | | 15_ | | | | |
| | | 15 | | | | |
| ELEVATION | IS SURFACE: TOP OF CASING: STATIC WATER LEVEL: WATER LEVEL AT TIME OF DRILLING: 7.5 | S | oil sample | e collected at 2 feet. | | |

| | | LOG | OF | GSB-2 | | PAGE No: 1 |
|----------------|---|-------------|------------|---|--|---------------------|
| 0 | nviro logic | CLIENT: | SCCBR | A/140273 | | |
| envir | ronmental consulting + services | LOCATION: | | Limited III LLC, 2654 20th Stre | eet, Port Huron, MI | |
| 2960 Inte | erstate Parkway | DRILLING CO | WMD | | START DATE: 00 | 6/18/2014 |
| | coo, Michigan 49048 342.1100 Fax: 269.342.4945 | GEOLOGIST: | RLW | | | 5/18/2014 |
| PID READING | SAMPLING | SAMPLES | SYMBOL | DES | SCRIPTION | |
| 0 | | | Soil sampl | FILL - gravelly sand, dar grained, poorly sorted, we brick fragments, cinders dry. ORGANIC MATERIAL - poer medium sand, wet. SAND - gray, very fine to with some silt, wet. TOTAL DEPTH = 10 FEE | with fine to medium s, and glass g=frag neat, black, with so | n gravel, ments, |
| ELEVATION | NS SURFACE: TOP OF CASING: STATIC WATER LEVEL: WATER LEVEL AT TIME OF DRILLING: 6 | | | | | |

| | | LOG | OF | GSB-3 | | PAGE No: 1 |
|----------------|---|-----------------|------------|--|-----------------------------------|-----------------|
| е | nviro logic | CLIENT: | SCCBRA | V/140273 | | |
| | ronmental consulting + services | LOCATION: | Chester | Limited III LLC, 2654 20th Str | eet, Port Huron, MI | |
| 2960 Inte | erstate Parkway 200, Michigan 49048 | DRILLING CO: | WMD | | START DATE: 06/ | /18/2014 |
| | 342.1100 Fax: 269.342.4945 | GEOLOGIST: | RLW | | COMPLETION DATE: 06 | /18/2014 |
| PID READING | SAMPLING | SAMPLES Feet | SYMBOL | | SCRIPTION | |
| | | | | FILL - sand, brown, fine sorted, with some fine t | o medium gravel, dr | ry. |
| | | | | CLAY - brownish gray, s | oft, low plasticity, d | lry. |
| 0 | | | | SAND - brown, fine grai silt, little organic materi | ned, well sorted, wit al, dry. | h some |
| | | 5 | | SAND - light brown, ver sorted, with some silt, v | y fine to fine grained vet. | i, well |
| 0 | | | | SAND - dark gray, very t sorted, with some silt, li | fine to fine grained, | well L. wet. |
| | | | | , | | , |
| | | 10 | | TOTAL DEPTH = 10 FEE | Т | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | 15 | | | | |
| ELEVATION | NS SURFACE: TOP OF CASING: STATIC WATER LEVEL: WATER LEVEL AT TIME OF DRILLING: 5.5 | s | oil sample | e collected at 2 feet. | | |

| | | LOG | OF | GSB-4 | | PAGE No: 1 |
|----------------|---|-------------|----------------|--|---------------------|------------|
| 0 | nviro logic | CLIENT: | SCCBR | A/140273 | | |
| | | LOCATION: | | r Limited III LLC, 2654 20th Stre | eet. Port Huron. MI | |
| 2960 Inte | ronmental consulting + services erstate Parkway | DRILLING CO | | | 1 | /18/2014 |
| | zoo, Michigan 49048 342.1100 Fax: 269.342.4945 | GEOLOGIST: | RLW | | | /18/2014 |
| | н | | | | | |
| PID READING | SAMPLING | SAMPLES | SYMBOL | | SCRIPTION | |
| | | 0 | <u>i l i l</u> | TOPSOIL SAND - brown, fine grain | ned well sorted wit | h trace |
| 0 | | | | SAND - light brown, very sorted, with some silt, d | ilt, dry. | |
| | | | | | | |
| | | | | TOTAL DEPTH = 10 FEE | 1 | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | 15 | | | | |
| ELEVATION | NS SURFACE: TOP OF CASING: STATIC WATER LEVEL: WATER LEVEL AT TIME OF DRILLING: 5.5 | \$ | Soil samp | le collected at 2 feet. | | |

| | | L | .00 | G | OF | GSB-5 | | PAGE No: 1 |
|----------------------|--|---------|---------------|-----|------------|--|---|------------|
| e | nvirologic | CLI | IENT: | | SCCBR | A/140273 | | |
| | ronmental consulting + services | LO | CATION | l: | Chester | Limited III LLC, 2654 20th Stre | et, Port Huron, M | I |
| 2960 Inte Kalamaz | erstate Parkway oo, Michigan 49048 | | ILLING | | WMD | | | 06/18/2014 |
| Ph: 269. | 342.1100 Fax: 269.342.4945 | GE | OLOGIS | ST: | RLW | | COMPLETION DATE: | 06/18/2014 |
| PID READING | SAMPLING | SAMPLES | Feet | | SYMBOL | DES | CRIPTION | |
| | | | — o - | | | CONCRETE | | |
| | | | _ | | | FILL - sand, brown, very sorted, with some silt, di | fine to fine grain y. | ed, well |
| 0 | | | _ | | | FILL - sand, dark brown, with some organic mater | fine grained, wel rial, some silt, dry | I sorted, |
| | | | _ | | | FILL - sand, brown, fine some silt, dry. | grained, well sort | ed, with |
| 0 | | | 5 - | | | | | |
| | | | | | | TOTAL DEPTH = 5 FEET | | |
| | | | _ | | | | | |
| | | | _ | - | | | | |
| | | - | _ | _ | | | | |
| | | | _ | | | | | |
| | | | | | | | | |
| | | | — 10 <i>-</i> | | | | | |
| | | | - | - | | | | |
| | | - | _ | - | | | | |
| | | | _ | _ | | | | |
| | | | _ | | | | | |
| | | | | | | | | |
| | | | — 15 <i>-</i> | | | | | |
| ELEVATION | NS SURFACE: TOP OF CASING: STATIC WATER LEVEL: WATER LEVEL AT TIME OF DRILLING: NA | | | S | oil sample | e collected at 2 feet. | | |
| | | | | | | | | |

| | | LOG | OF | GSB-6 | PAGE No: 1 |
|--|------------|-------------|------------|--|------------|
| envirologic | - | CLIENT: | SCCBR | A/140273 | |
| environmental consulting + services | L | OCATION: | Chester | Limited III LLC, 2654 20th Street, Port Huron, MI | |
| 2960 Interstate Parkway Kalamazoo, Michigan 49048 | _ | ORILLING CO | WMD | | /18/2014 |
| Ph: 269.342.1100 Fax: 269.342.4945 | | SEOLOGIST: | RLW | COMPLETION DATE: 06 | /18/2014 |
| READING SAMPLING | RESISTANCE | Feet | SYMBOL | DESCRIPTION | |
| | | 0 — | | CONCRETE | |
| | | | | FILL - sand, brown, very fine to fine grained sorted, with some silt, dry. | i, well |
| 0 | | | | | |
| | | | | | |
| 0 | | | | FILL - sand, dark brown, fine grained, well with little silt, some organic material, dry. REFUSAL AT 3.5 FEET | sorted, |
| | | | | | |
| | | 5 — | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | 10 | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | 15 | | | |
| | | | | | |
| ELEVATIONS SURFACE: TOP OF CASING: STATIC WATER LEVEL: WATER LEVEL AT TIME OF DRILLING: NA | I | S | Soil sampl | e collected at 2 feet. | |
| | | | | | |

| | | LOG | OF | TMW-1 | | PAGE No: 1 | | |
|----------------|---|-----------------|---|---|-------------------------------|-------------|--|--|
| | nvirologic | CLIENT: | SCCBR | | | | | |
| | | LOCATION: | Chester Limited III LLC, 2654 20th Street, Port Huron, MI | | | | | |
| | ronmental consulting + services erstate Parkway | DRILLING CO: | | | 6/18/2014 | | | |
| | 200, Michigan 49048 342.1100 Fax: 269.342.4945 | GEOLOGIST: | RLW | | | 6/18/2014 | | |
| | | | | | | 0, 10, 2014 | | |
| PID READING | SAMPLING | SAMPLES Feet | SYMBOL | DES | SCRIPTION | | | |
| 0 | | | | TOPSOIL SANDY CLAY - light brog | | | | |
| 5.6 | | 5 | | SAND - dark brown, fine some silt, some organic moderate odor, black sta at water table. | material, dry, wet | at 5 feet, | | |
| | | | | SAND - brown, fine grain silt, wet. | ned, well sorted, w | ith some | | |
| | | | | SAND - brownish gray, v sorted, with some silt, w | very fine to fine gra vet. | ained, well | | |
| | | 10 | | TOTAL DEPTH = 10 FEE | Т | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | 15 | | | | | | |
| ELEVATION | NS SURFACE: TOP OF CASING: STATIC WATER LEVEL: WATER LEVEL AT TIME OF DRILLING: 5 | W | Jater sam | ple collected at 4 - 9 feet. | | | | |

| | | LOG | OF | TMW-2 | | PAGE No: 1 |
|----------------|---|--------------|-----------|---|----------------------|------------------------|
| | nvirologic | CLIENT: | SCCRP | A/140273 | | |
| | Mologic | LOCATION: | | Limited III LLC, 2654 20th Stre | eet Port Huron MI | |
| | ronmental consulting + services erstate Parkway | DRILLING CO: | | Emilia in EEG, EGG EGH Gu | 1 | 2/4.0/2.04.4 |
| | 200, Michigan 49048 342.1100 Fax: 269.342.4945 | GEOLOGIST: | RLW | | | 5/18/2014 5/18/2014 |
| | ш | | ILIV | | | 710/2014 |
| PID READING | SAMPLING | SAMPLES Feet | SYMBOL | DE: | SCRIPTION | |
| 0 | | | | TOPSOIL SANDY CLAY - light bro fine sand, dry. SAND - dark brown, fine some silt, some fine to r 5 feet. | grained, well sorte | ed, with |
| 1.8 | | | | SAND - brown, fine grain silt, wet, slight odor. | ned, well sorted, wi | th some |
| | | | | TOTAL DEPTH = 10 FEE | T | |
| ELEVATION | NS SURFACE: TOP OF CASING: STATIC WATER LEVEL: WATER LEVEL AT TIME OF DRILLING: 5 | , v | later sam | ple collected at 4 - 9 feet. | | |

| | | LOG | OF | TMW-3 | PAGE No: 1 |
|----------------|---|-----------------|----------|--|------------|
| 0 | nvirologic | CLIENT: | SCCE | BRA/140273 | |
| envii | ronmental consulting + services | LOCATION: | Chest | ter Limited III LLC, 2654 20th Street, Port Huron, MI | |
| 2960 Inte | erstate Parkway | DRILLING CO | : WMD | START DATE: 06 | /18/2014 |
| | oo, Michigan 49048 342.1100 Fax: 269.342.4945 | GEOLOGIST: | RLW | | /18/2014 |
| PID READING | SAMPLING | SAMPLES Feet | SYMBOL | DESCRIPTION | |
| 0 | | | | TOPSOIL CLAYEY SAND - light brown, fine grained, sorted, with clay binder, trace fine to medic gravel, dry. SAND - brown, fine grained, well sorted, wi silt, little organic material, dry. ORGANIC MATERIAL - peat, black, with tragravel, slightly damp. | th some |
| 0 | | | | SAND - brown, fine grained, well sorted, wi | |
| | | | | SAND - dark gray, very fine to fine grained, sorted, with some silt, some organic mater | ial, dry. |
| | | 10- | | TOTAL DEPTH = 10 FEET | |
| | | | _ | | |
| | | 15 | - | | |
| ELEVATION | IS SURFACE: TOP OF CASING: STATIC WATER LEVEL: WATER LEVEL AT TIME OF DRILLING: 7 | , | Water sa | ample collected at 5 - 10 feet. | |

APPENDIX C

FIBERTEC ENVIRONMENTAL SERVICES, INC. LABORATORY REPORTS



Thursday, June 26, 2014

Fibertec Project Number: 62801

Project Identification: SCCBRA(16) /140273

Submittal Date: 06/19/2014

Mr. David Stegink Envirologic Technologies, Inc. 2960 Interstate Parkway Kalamazoo, MI 49048

Dear Mr. Stegink,

Thank you for selecting Fibertec Environmental Services as your analytical laboratory. The samples you submitted have been analyzed in accordance with NELAC standards and the results compiled in the attached report. Any exceptions to NELAC compliance are noted in the report. These results apply only to those samples submitted. Please note TO-15 samples will be disposed of 14 days after the reporting date. All other samples will be disposed of 30 days after the reporting date.

If you have any questions regarding these results or if we may be of further assistance to you, please contact me at (517) 699-0345.

Sincerely,

Daryl P. Strandbergh Laboratory Director

DPS/kc

Enclosures



Order: 62801 Page: 2 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: Trip Blank Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 1 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Ground Water Collect Time: NA

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | | Aliquot ID: | 62801-001 | Matrix: Ground Water | | | |
|--|--------|-------|------------------|-------------|-----------|----------------------|----------|----------|------|
| | | | | | Prep | aration | Į. | Analysis | |
| Parameter(s) | Result | Q Uni | s Reporting Limi | t Dilution | P. Date | P. Batch | A. Date | A. Batch | Init |
| 1. Acetone | U | μg/ | L 50 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPI |
| 2. Acrylonitrile | U | μg/ | 2.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPI |
| 3. Benzene | U | μg/ | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPI |
| 4. Bromobenzene | U | μg/ | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPI |
| 5. Bromochloromethane | U | μg/ | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 6. Bromodichloromethane | U | μg/ | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 7. Bromoform | U | μg/ | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 8. Bromomethane | U | μg/ | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 9. 2-Butanone | U | μg/ | _ 25 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 10. n-Butylbenzene | U | μg/ | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 11. sec-Butylbenzene | U | μg/ | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 12. tert-Butylbenzene | U | μg/ | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 13. Carbon Disulfide | U | μg/ | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 14. Carbon Tetrachloride | U | μg/ | _ 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 15. Chlorobenzene | U | μg/ | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 16. Chloroethane | U | μg/ | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 17. Chloroform | U | μg/ | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 18. Chloromethane | U | μg/ | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 19. 2-Chlorotoluene | U | μg/ | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 20. Dibromochloromethane | U | μg/ | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 21. 1,2-Dibromo-3-chloropropane (SIM) | U | μg/ | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 22. Dibromomethane | U | μg/ | _ 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JF |
| 23. 1,2-Dichlorobenzene | U | μg/ | | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 24. 1,3-Dichlorobenzene | U | μg/ | _ 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 25. 1,4-Dichlorobenzene | U | μg/ | | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | μg/ | _ 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 27. Dichlorodifluoromethane | U | μg/ | | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JF |
| 28. 1,1-Dichloroethane | U | μg/ | _ 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 29. 1,2-Dichloroethane | U | μg/ | | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 30. 1,1-Dichloroethene | U | μg/ | | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | |
| 31. cis-1,2-Dichloroethene | U | μg/ | | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 32. trans-1,2-Dichloroethene | U | μg/ | | | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | |
| 33. 1,2-Dichloropropane | U | μg/ | | | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | |
| 34. cis-1,3-Dichloropropene | U | μg/ | | | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | |
| 35. trans-1,3-Dichloropropene | U | μg/ | | | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | |
| 36. Diethyl Ether | U | μg/ | | | 06/23/14 | VB11F23C | 06/23/14 | VB11123C | |
| 37. Ethylbenzene | U | μg/ | | | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | |
| 38. Ethylene Dibromide | U | μg/ | | | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | |

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Order: 62801 Page: 3 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sam

Sample Description: Trip Blank

Chain of Custody: 11

113540

Client Project Name: SCCBRA(16)

Sample No: 1

Collect Date:

06/18/14

Client Project No: 140

140273 Sample Matrix:

Ground Water Collect Time:

llect Time: NA

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | A | liquot ID: 6 | 2801-001 | Matrix: G | round Water | | |
|--|--------|---------|-----------------|--------------|----------|-----------|-------------|----------|-------|
| 2 | | | | | Prepa | | | nalysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| ‡ 39. Hexachloroethane | U | μg/L | 2.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 40. 2-Hexanone | U | μg/L | 50 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 41. Isopropylbenzene | U | μg/L | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 42. Methylene Chloride | U | μg/L | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| ‡ 43.2-Methylnaphthalene | U | μg/L | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 44. 4-Methyl-2-pentanone | U | μg/L | 50 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 45. MTBE | U | μg/L | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 46. Naphthalene | U | μg/L | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 47. n-Propylbenzene | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 48. Styrene | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 49. 1,1,1,2-Tetrachloroethane | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 50. 1,1,2,2-Tetrachloroethane | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 51. Tetrachloroethene | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 52 Toluene | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 53. 1,2,4-Trichlorobenzene | U | μg/L | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 54.1,1,1-Trichloroethane | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 55. 1,1,2-Trichloroethane | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 56. Trichloroethene | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 57. Trichlorofluoromethane | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 58. 1,2,3-Trichloropropane | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 59. 1,2,3-Trimethylbenzene | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 60. 1,2,4-Trimethylbenzene | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 61. 1,3,5-Trimethylbenzene | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 62. Vinyl Chloride | U | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 63. Xylenes | U | μg/L | 3.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |



Order: 62801 Page: 4 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: Methanol Blank Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 2 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: NA

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260E | 3) | | A | liquot ID: 62 | 2801-002 | Matrix: So | oil/Solid | | |
|--|----------|---------|------------------|---------------|----------|------------|-----------|----------|-----|
| 5 | 5 | | B 2 11 11 | D'I d' | Prepa | | | nalysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Ini |
| 1. Acetone | U | μg/kg | 1000 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 2. Acrylonitrile | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 3. Benzene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 4. Bromobenzene | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 5. Bromochloromethane | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 6. Bromodichloromethane | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 7. Bromoform | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 8. Bromomethane | U | μg/kg | 200 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 9. 2-Butanone | U | μg/kg | 750 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 10. n-Butylbenzene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 11. sec-Butylbenzene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 12. tert-Butylbenzene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 13. Carbon Disulfide | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 14. Carbon Tetrachloride | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | С |
| 15. Chlorobenzene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 16. Chloroethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | С |
| 17. Chloroform | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | С |
| 18. Chloromethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | С |
| 19. 2-Chlorotoluene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 20. Dibromochloromethane | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 21. 1,2-Dibromo-3-chloropropane (SIM) | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 22. Dibromomethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 23. 1,2-Dichlorobenzene | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 24. 1,3-Dichlorobenzene | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 25. 1,4-Dichlorobenzene | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 27. Dichlorodifluoromethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 28. 1,1-Dichloroethane | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 29. 1,2-Dichloroethane | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 30. 1,1-Dichloroethene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 31. cis-1,2-Dichloroethene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 32. trans-1,2-Dichloroethene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 33. 1,2-Dichloropropane | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 34. cis-1,3-Dichloropropene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | С |
| 35 trans-1,3-Dichloropropene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 36 Diethyl Ether | U | μg/kg | 200 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 37. Ethylbenzene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 38. Ethylene Dibromide | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |

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RSN: 62801-140626153334



Order: 62801 Page: 5 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: Methanol Blank Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 2 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: NA

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260B |) | | | Al | iquot ID: 62 | 2801-002 | Matrix: So | oil/Solid | | |
|--|--------|---|-------|-----------------|--------------|----------|------------|-----------|----------|-------|
| | | | | | | Prepa | ration | Α | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| ‡ 39. Hexachloroethane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 40. 2-Hexanone | U | | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 41. Isopropylbenzene | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 42. Methylene Chloride | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| ‡ 43. 2-Methylnaphthalene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 44. 4-Methyl-2-pentanone | U | | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 45. MTBE | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 46. Naphthalene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 47. n-Propylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 48. Styrene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 49. 1,1,1,2-Tetrachloroethane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 50. 1,1,2,2-Tetrachloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 51. Tetrachloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 52. Toluene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 53. 1,2,4-Trichlorobenzene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 54. 1,1,1-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 55. 1,1,2-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 56. Trichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 57. Trichlorofluoromethane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 58. 1,2,3-Trichloropropane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| ‡ 59. 1,2,3-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 60. 1,2,4-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 61. 1,3,5-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 62. Vinyl Chloride | U | | μg/kg | 40 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 63. Xylenes | U | | μg/kg | 150 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |

DCSID: G-610.15 (10/09/13)



Order: 62801 Page: 6 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-6 @ 2 Chain of Custody: 113540 Client Project Name: SCCBRA(16) Sample No: 3 Collect Date: 06/18/14 Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 12:00 Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted. Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis. Dry Weight Determination (ASTM D 2974-87) Aliquot ID: 62801-003A Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 1. Percent Moisture (Water Content) 2.6 % 0.1 06/23/14 MC140623 06/24/14 MC140623 BMG 1.0 Aliquot ID: 62801-003A Michigan 10 Elements by ICP/MS (EPA 0200.2-M/EPA 6020A) Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 1. Arsenic 06/24/14 PT14F24M T214F25A JLP 600 μg/kg 100 20 06/25/14 2. Barium 6400 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP П PT14F24M T214F25A 3. Cadmium 50 20 06/24/14 06/25/14 JLP µg/kg 3600 500 20 06/24/14 PT14F24M 06/25/14 T214F25A 4. Chromium µg/kg JI P 5. Copper 1900 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 6 Lead 1200 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JI P μg/kg 7. Selenium U 200 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP µg/kg T214F25A 8 Silver IJ 100 20 06/24/14 PT14F24M 06/25/14 JI P μg/kg 9. Zinc 7000 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP µg/kg Mercury by CVAAS (EPA 7471B) Aliquot ID: 62801-003A Matrix: Soil/Solid Preparation Analysis Reporting Limit Parameter(s) Result O Dilution P. Date Units P. Batch A. Date A. Batch Init 1. Mercury U μg/kg 50 9.6 06/24/14 PM14F24A 06/25/14 M614F25A JLH Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) Aliquot ID: 62801-003 Matrix: Soil/Solid Preparation Analysis Q Parameter(s) Result Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init U 1000 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 1. Acetone ua/ka 2. Acrylonitrile U μg/kg 100 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 3 Benzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 4. Bromobenzene μg/kg 100 1.0 U 06/20/14 VH14F20B VH14F20B CCD 5. Bromochloromethane 100 1.0 06/21/14 μg/kg 6. Bromodichloromethane U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg 100 1.0 7. Bromoform U μg/kg 100 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 8. Bromomethane U μg/kg 200 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD п VH14F20B VH14F20B CCD 9. 2-Butanone 750 1.0 06/20/14 06/21/14 µg/kg 10. n-Butylbenzene U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 50 μg/kg 11. sec-Butylbenzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 12. tert-Butvlbenzene μg/kg 50 13. Carbon Disulfide U µg/kg 250 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 1914 Holloway Drive Holt, MI 48842 T: (517) 699-0345 F: (517) 699-0388

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Cadillac, MI 49601

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8660 S. Mackinaw Trail



Order: 62801 Page: 7 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-6 @ 2 Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 3 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 12:00

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260E | 3) | | Α | liquot ID: 62 | 2801-003 | Matrix: So | oil/Solid | | |
|--|--------|---------|-----------------|---------------|----------|------------|-----------|----------|-------|
| | | | | | Prepa | ration | Α | nalysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| 14. Carbon Tetrachloride | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 15. Chlorobenzene | U | μg/kg | 51 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 16. Chloroethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 17. Chloroform | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 18. Chloromethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 19. 2-Chlorotoluene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 20. Dibromochloromethane | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 21. 1,2-Dibromo-3-chloropropane (SIM) | U | μg/kg | 51 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 22. Dibromomethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 23. 1,2-Dichlorobenzene | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 24. 1,3-Dichlorobenzene | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 25. 1,4-Dichlorobenzene | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 27. Dichlorodifluoromethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 28. 1,1-Dichloroethane | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | СС |
| 29. 1,2-Dichloroethane | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 30. 1,1-Dichloroethene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | СС |
| 31. cis-1,2-Dichloroethene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 32. trans-1,2-Dichloroethene | U | μg/kg | 51 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | СС |
| 33. 1,2-Dichloropropane | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 34. cis-1,3-Dichloropropene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | СС |
| 35. trans-1,3-Dichloropropene | U | μg/kg | 51 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 36. Diethyl Ether | U | μg/kg | 200 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 37. Ethylbenzene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 38. Ethylene Dibromide | U | μg/kg | 51 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 39. Hexachloroethane | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 40. 2-Hexanone | U | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 41. Isopropylbenzene | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 42. Methylene Chloride | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | СС |
| 43. 4-Methyl-2-pentanone | U | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 44. MTBE | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | СС |
| 45. Naphthalene | U | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 46. n-Propylbenzene | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 47. Styrene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 48. 1,1,1,2-Tetrachloroethane | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 49. 1,1,2,2-Tetrachloroethane | U | μg/kg | 51 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 50. Tetrachloroethene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 51. Toluene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |

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Order: 62801 Page: 8 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-6 @ 2 Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 3 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 12:00

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8 | 260B) | | | A | liquot ID: 62 | 2801-003 | Matrix: So | oil/Solid | | |
|--|--------|---|-------|-----------------|---------------|----------|------------|-----------|----------|-------|
| | | | | | | Prepa | ration | Д | Analysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 52.1,2,4-Trichlorobenzene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 53.1,1,1-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 54.1,1,2-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 55. Trichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 56. Trichlorofluoromethane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 57. 1,2,3-Trichloropropane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| ‡ 58.1,2,3-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 59. 1,2,4-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 60. 1,3,5-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 61. Vinyl Chloride | U | | μg/kg | 40 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 62. Xylenes | U | | μg/kg | 150 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |

| Polynuclear Aromatic Hydrocarbons (PNAs) (EPA 3546/EPA 8270C) | ?70C) | A | iquot ID: 62 | 801-003A | Matrix: So | oil/Solid | | | | |
|---|--------|---|--------------|-----------------|------------|-----------|----------|----------|----------|-------|
| | | | | | | Prepa | ration | A | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| 1. Acenaphthene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 2. Acenaphthylene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 3. Anthracene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 4. Benzo(a)anthracene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 5. Benzo(a)pyrene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 6. Benzo(b)fluoranthene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 7. Benzo(ghi)perylene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 8. Benzo(k)fluoranthene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 9. Chrysene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 10. Dibenzo(a,h)anthracene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 11. Fluoranthene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 12. Fluorene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 13. Indeno(1,2,3-cd)pyrene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 14. 2-Methylnaphthalene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 15. Phenanthrene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAI |
| 16. Pyrene (SIM) | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |

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Order: 62801 Page: 9 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-5 @ 2 Chain of Custody: 113540 Client Project Name: SCCBRA(16) Sample No: Collect Date: 06/18/14 Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 12:20 Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted. Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis. Dry Weight Determination (ASTM D 2974-87) Aliquot ID: 62801-004A Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 1. Percent Moisture (Water Content) 10 % 0.1 06/23/14 MC140623 06/24/14 MC140623 BMG 1.0 Aliquot ID: 62801-004A Michigan 10 Elements by ICP/MS (EPA 0200.2-M/EPA 6020A) Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 2100 06/24/14 PT14F24M T214F25A JLP 1. Arsenic μg/kg 100 20 06/25/14 2. Barium 30000 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP PT14F24M T214F25A 3. Cadmium 310 50 20 06/24/14 06/25/14 JLP µg/kg 6000 500 20 06/24/14 PT14F24M 06/25/14 T214F25A 4. Chromium µg/kg JI P 5. Copper 24000 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 6 Lead 41000 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JI P μg/kg 7. Selenium 330 200 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP µg/kg T214F25A 8 Silver 100 20 06/24/14 PT14F24M 06/25/14 JI P U μg/kg 62000 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 9. Zinc µg/kg Mercury by CVAAS (EPA 7471B) Aliquot ID: 62801-004A Matrix: Soil/Solid Preparation Analysis O Parameter(s) Result Dilution P. Date Units Reporting Limit P. Batch A. Date A. Batch Init 1. Mercury 66 50 8.7 06/24/14 PM14F24A 06/25/14 M614F25A JLH ua/ka Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) Aliquot ID: 62801-004 Matrix: Soil/Solid Preparation Analysis Q Parameter(s) Result Units Reporting Limit Dilution P. Date P Batch A. Date A. Batch Init U 1000 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD 1. Acetone ua/ka 2. Acrylonitrile U μg/kg 110 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD 3 Benzene U 56 1.0 06/23/14 V.J14F23A 06/23/14 VJ14F23A CCD μg/kg U 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD 4. Bromobenzene μg/kg 100 1.0 U 06/23/14 VJ14F23A VJ14F23A CCD 5. Bromochloromethane 100 1.0 06/23/14 μg/kg 6. Bromodichloromethane U 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD μg/kg 100 1.0 VJ14F23A CCD 7. Bromoform U μg/kg 100 1.0 06/23/14 VJ14F23A 06/23/14 8. Bromomethane U μg/kg 200 1.0 06/23/14 V.J14F23A 06/23/14 VJ14F23A CCD п VJ14F23A VJ14F23A CCD 9. 2-Butanone 750 1.0 06/23/14 06/23/14 µg/kg 10. n-Butylbenzene U 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD 56 μg/kg 11. sec-Butylbenzene U 56 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD μg/kg U 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD 12. tert-Butvlbenzene μg/kg 56 13. Carbon Disulfide U µg/kg 250 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD

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Brighton, MI 48116

Cadillac, MI 49601

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8660 S. Mackinaw Trail



Order: 62801 Page: 10 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-5 @ 2 Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 4 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 12:20

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260 | B) | | Α | liquot ID: 6 | 2801-004 | Matrix: S | oil/Solid | | |
|---|--------|---------|-----------------|--------------|----------|-----------|-----------|----------|------|
| | | | | | Prepa | ration | Α | Analysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init |
| 14. Carbon Tetrachloride | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 15. Chlorobenzene | U | μg/kg | 50 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 16. Chloroethane | U | μg/kg | 280 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 17. Chloroform | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 18. Chloromethane | U | μg/kg | 280 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 19. 2-Chlorotoluene | U | μg/kg | 50 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 20. Dibromochloromethane | U | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 21.1,2-Dibromo-3-chloropropane (SIM) | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 22. Dibromomethane | U | μg/kg | 250 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 23. 1,2-Dichlorobenzene | U | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 24. 1,3-Dichlorobenzene | U | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 25. 1,4-Dichlorobenzene | U | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 27. Dichlorodifluoromethane | U | μg/kg | 250 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 28. 1,1-Dichloroethane | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 29. 1,2-Dichloroethane | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 30. 1,1-Dichloroethene | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 31. cis-1,2-Dichloroethene | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 32. trans-1,2-Dichloroethene | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 33. 1,2-Dichloropropane | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 34. cis-1,3-Dichloropropene | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 35. trans-1,3-Dichloropropene | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 36. Diethyl Ether | U | μg/kg | 200 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 37. Ethylbenzene | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 38. Ethylene Dibromide | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 39. Hexachloroethane | U | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 40. 2-Hexanone | U | μg/kg | 2500 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 41. Isopropylbenzene | U | μg/kg | 280 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 42. Methylene Chloride | U | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 43. 4-Methyl-2-pentanone | U | μg/kg | 2500 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 44. MTBE | U | μg/kg | 250 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 45. Naphthalene | U | μg/kg | 330 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 46. n-Propylbenzene | U | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 47. Styrene | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 48. 1,1,1,2-Tetrachloroethane | U | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 49. 1,1,2,2-Tetrachloroethane | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 50. Tetrachloroethene | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 51. Toluene | U | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368



Order: 62801 Page: 11 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-5 @ 2 Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 4 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 12:20

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 82 | 260B) | | | Al | iquot ID: 62 | 2801-004 Matrix: S | | oil/Solid | | |
|---|--------|---|-------|-----------------|--------------|--------------------|----------|-----------|------------|-------|
| | | | | | | Prepa | ration | А | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 52.1,2,4-Trichlorobenzene | U | | μg/kg | 330 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCL |
| 53.1,1,1-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCE |
| 54. 1,1,2-Trichloroethane | U | | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCI |
| 55. Trichloroethene | U | | μg/kg | 56 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCI |
| 56. Trichlorofluoromethane | U | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCI |
| 57. 1,2,3-Trichloropropane | U | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCI |
| ‡ 58. 1,2,3-Trimethylbenzene | U | | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A (| CCE |
| 59. 1,2,4-Trimethylbenzene | U | | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCI |
| 60. 1,3,5-Trimethylbenzene | U | | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCI |
| 61. Vinyl Chloride | U | | μg/kg | 40 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCI |
| 62. Xylenes | U | | μg/kg | 170 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A (| CCI |

| Polynuclear Aromatic Hydrocarbons (PNAs) (EPA 3546/EPA 8270C) | | Α | liquot ID: 62 | 801-004A | Matrix: S | oil/Solid | | | |
|---|----------|---------|-----------------|----------|-----------|-----------|----------|----------|-------|
| | | | | | Prepa | ration | Д | nalysis | |
| Parameter(s) | Result Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 1. Acenaphthene (SIM) | U | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 2. Acenaphthylene (SIM) | U | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 3. Anthracene (SIM) | U | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 4. Benzo(a)anthracene (SIM) | 390 | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 5. Benzo(a)pyrene (SIM) | U | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 6. Benzo(b)fluoranthene (SIM) | 800 | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 7. Benzo(ghi)perylene (SIM) | U | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 8. Benzo(k)fluoranthene (SIM) | U | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 9. Chrysene (SIM) | U | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 10. Dibenzo(a,h)anthracene (SIM) | U | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 11. Fluoranthene (SIM) | 1000 | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 12. Fluorene (SIM) | U | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 13. Indeno(1,2,3-cd)pyrene (SIM) | 370 | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 14. 2-Methylnaphthalene (SIM) | U J,N | 1 μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 15. Phenanthrene (SIM) | 900 | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 16. Pyrene (SIM) | 1300 | µg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |

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Order: 62801 Page: 12 of 49 Date: 06/26/14

| Envirologic Technologies | s, Inc. | | Sample De | scription: GSB- | 5 @ 2 MS | | Chain | of Custody: | 113540 | |
|------------------------------|---|--|---|--|-------------------------|----------------------|-----------------------------|--|--|--|
| SCCBRA(16) | | | Sample No | : 5 | | | Collec | t Date: | 06/18/14 | |
| 140273 | | | Sample Ma | trix: Soil/S | Solid | | Collec | t Time: | 12:20 | |
| Soil results have been ca | lculated | and rep | orted on a | dry weight basi | s unless oth | erwise noted. | | | | |
| Q: Qualifier (see definition | s at end o | of report |) NA: Not | : Applicable ‡: F | arameter not | t included in NEL | AC Scope of A | nalysis. | | |
| <u> </u> | | | - | | | | · · · | - | | |
| ation (ASTM D 2974-87) | | | | | Aliquot ID: 6 | 62801-005A | Matrix: So | oil/Solid | | |
| | Danish | 0 | 11-4- | Danastia a Linate | Dilution | | | | | 1-14 |
| | | Q | | | | | | | | Init |
| (Water Content) | 6.1 | | % | 0.1 | 1.0 | 06/23/14 | MC140623 | 06/24/14 | MC140623 | BM |
| | 4/504.00 | | | | AII ID | 2004 0054 | | | | |
| s by ICP/MS (EPA 0200.2-I | W/EPA 60 | 20A) | | | Aliquot ID: 6 | 52801-005A | Matrix: So | oil/Solid | | |
| | Result | Q | Units | Reporting Limit | Dilution | Prepa P. Date | ration P. Batch | A. Date | Analysis A. Batch | Init |
| | 12000 | | μg/kg | 100 | 20 | 06/24/14 | PT14F24M | 06/25/14 | T214F25A | JLF |
| | 76000 | | μg/kg | 1000 | 20 | 06/24/14 | PT14F24M | 06/25/14 | T214F25A | JLF |
| | 10000 | | μg/kg | 50 | 20 | 06/24/14 | PT14F24M | 06/25/14 | T214F25A | JLI |
| | 26000 | | μg/kg | 500 | 20 | 06/24/14 | PT14F24M | 06/25/14 | T214F25A | JLI |
| | 43000 | | μg/kg | 1000 | 20 | 06/24/14 | PT14F24M | 06/25/14 | T214F25A | JLI |
| | 54000 | | μg/kg | 1000 | 20 | 06/24/14 | PT14F24M | 06/25/14 | T214F25A | JLI |
| | 8800 | | μg/kg | 200 | 20 | 06/24/14 | PT14F24M | 06/25/14 | T214F25A | JLI |
| | 9300 | | μg/kg | 100 | 20 | 06/24/14 | PT14F24M | 06/25/14 | T214F25A | JLI |
| | 98000 | | µg/kg | 1000 | 20 | 06/24/14 | PT14F24M | 06/25/14 | T214F25A | JLF |
| PA 7471B) | | | | | Aliquot ID: 6 | 62801-005A | Matrix: So | oil/Solid | | |
| | | | | | | Prepa | ration | | Analysis | |
| | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init |
| | 230 | | µg/kg | 50 | 8.9 | 06/24/14 | PM14F24B | 06/25/14 | M614F25A | JL |
| 5 (EPA 5035/EPA 8260B) | | | | | Aliquot ID: 6 | S2801-005 | Matrix: So | oil/Solid | | |
| , | | | | | | Prena | ration | | Analysis | |
| | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init |
| | 3600 | | μg/kg | 1000 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| | 4500 | | | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | |
| | 5100 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| | 5000 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | СС |
| hane | 4500 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| ethane | 5100 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| | 5500 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| | 5400 | | μg/kg | 200 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| | 4300 | | μg/kg | 750 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| | 0500 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| | 6500 | | 1.3.3 | | | | | | | |
| e | 6100 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| e e | | | | 53 53 | 1.0 1.0 | 06/23/14 06/23/14 | VJ14F23A VJ14F23A | 06/23/14 06/23/14 | VJ14F23A VJ14F23A | |
| | Soil results have been ca Q: Qualifier (see definition ation (ASTM D 2974-87) | Soil results have been calculated Q: Qualifier (see definitions at end of ation (ASTM D 2974-87) Result (Water Content) Result 12000 76000 10000 26000 43000 54000 8800 9300 98000 PA 7471B) Result 230 February Result 12000 76000 10000 26000 43000 54000 8800 9300 98000 Result 230 Result 230 February Result 230 Result 230 February Result 230 February Result 230 February Result 230 February Result 230 February Result 230 February Result 230 February Result 230 February Result 230 February Result 230 February Result 230 February February Result 230 February Fe | Soil results have been calculated and report ation (ASTM D 2974-87) Result Q (Water Content) 6.1 S by ICP/MS (EPA 0200.2-M/EPA 6020A) Result Q 12000 76000 10000 26000 43000 54000 8800 9300 98000 EPA 7471B) Result Q 230 S (EPA 5035/EPA 8260B) Result Q 230 S (EPA 5035/EPA 8260B) | Nample Mark Soil results have been calculated and reported on a calculated and reported on a calculated and reported on a calculated and report) NA: Not calculated and report NA: Not calculated and report | Nample Matrix: Soil/S | Name | Sample Matrix: Soil/Soild | 140273 Sample Matrix: Soil/Soild Collect | 140273 Sample Matrix Soil/Soil Collect Time: | 140273 Sample Matrix: Soil/Soild Collect Time: 12:20 |

T: (810) 220-3300

T: (231) 775-8368

F: (810) 220-3311

F: (231) 775-8584

Brighton, MI 48116

Cadillac, MI 49601

1914 Holloway Drive 11766 E. Grand River

8660 S. Mackinaw Trail



Order: 62801 Page: 13 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-5 @ 2 MS Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 5 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 12:20

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260 | B) | | | Al | iquot ID: 62 | 801-005 | Matrix: So | oil/Solid | | |
|---|--------|---|-------|-----------------|--------------|----------|------------|-----------|----------|-----|
| | | | | | | Prepa | | ļ | Analysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Ini |
| 14. Carbon Tetrachloride | 5400 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 15. Chlorobenzene | 5300 | | μg/kg | 50 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 16. Chloroethane | 5100 | | μg/kg | 270 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 17. Chloroform | 5100 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 18. Chloromethane | 4300 | | μg/kg | 270 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 19. 2-Chlorotoluene | 5500 | | μg/kg | 50 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 20. Dibromochloromethane | 5500 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| ‡ 21.1,2-Dibromo-3-chloropropane (SIM) | 5400 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 22. Dibromomethane | 5100 | | μg/kg | 250 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 23. 1,2-Dichlorobenzene | 5400 | | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 24. 1,3-Dichlorobenzene | 5400 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 25. 1,4-Dichlorobenzene | 5300 | | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 26. trans-1,4-Dichloro-2-butene (SIM) | 5500 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 27. Dichlorodifluoromethane | 4800 | | μg/kg | 250 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 28. 1,1-Dichloroethane | 4800 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 29. 1,2-Dichloroethane | 4700 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 30. 1,1-Dichloroethene | 4800 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 31. cis-1,2-Dichloroethene | 4900 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 32. trans-1,2-Dichloroethene | 5000 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 33. 1,2-Dichloropropane | 5000 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 34. cis-1,3-Dichloropropene | 5600 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 35. trans-1,3-Dichloropropene | 5400 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 36. Diethyl Ether | 4800 | | μg/kg | 200 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 37. Ethylbenzene | 5500 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 38. Ethylene Dibromide | 5200 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 39. Hexachloroethane | 5500 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 40. 2-Hexanone | 4800 | | μg/kg | 2500 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 41. Isopropylbenzene | 5600 | | μg/kg | 270 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 42. Methylene Chloride | 4600 | | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 43. 4-Methyl-2-pentanone | 4500 | | μg/kg | 2500 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 44. MTBE | 4900 | | μg/kg | 250 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 45. Naphthalene | 4300 | | μg/kg | 330 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 46. n-Propylbenzene | 5600 | | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | |
| 47. Styrene | 5200 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | |
| 48.1,1,1,2-Tetrachloroethane | 5300 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | |
| 49. 1,1,2,2-Tetrachloroethane | 5200 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | |
| 50. Tetrachloroethene | 5700 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | |
| 51. Toluene | 5100 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | |

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Order: 62801 Page: 14 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-5 @ 2 MS Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 5 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 12:20

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 826 | 0B) | | | Al | iquot ID: 62 | 2801-005 | Matrix: So | oil/Solid | | |
|--|--------|---|-------|-----------------|--------------|----------|------------|-----------|----------|-------|
| | | | | | | Prepa | ration | Д | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 52.1,2,4-Trichlorobenzene | 6000 | | μg/kg | 330 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 53.1,1,1-Trichloroethane | 5300 | | μg/kg | 50 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 54.1,1,2-Trichloroethane | 5200 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 55. Trichloroethene | 5500 | | μg/kg | 53 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 56. Trichlorofluoromethane | 5700 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 57. 1,2,3-Trichloropropane | 5100 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| ‡ 58.1,2,3-Trimethylbenzene | 5500 | | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 59. 1,2,4-Trimethylbenzene | 5800 | | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 60. 1,3,5-Trimethylbenzene | 5800 | | μg/kg | 110 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 61. Vinyl Chloride | 5000 | | μg/kg | 40 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 62. Xylenes | 17000 | | μg/kg | 160 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |

| Polynuclear Aromatic Hydrocarbons (PNAs) (EPA 3546/EPA 8270C) | | 270C) | Α | liquot ID: 62 | 2801-005A | Matrix: Soil/Solid | | | | |
|---|--------|-------|-------|-----------------|-----------|--------------------|----------|----------|----------|-------|
| | | | | | | Prepa | ration | Д | Analysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 1. Acenaphthene (SIM) | 5100 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 2. Acenaphthylene (SIM) | 5400 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 3. Anthracene (SIM) | 4900 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 4. Benzo(a)anthracene (SIM) | 5000 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 5. Benzo(a)pyrene (SIM) | 5300 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 6. Benzo(b)fluoranthene (SIM) | 5900 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 7. Benzo(ghi)perylene (SIM) | 5700 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 8. Benzo(k)fluoranthene (SIM) | 5400 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 9. Chrysene (SIM) | 5300 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 10. Dibenzo(a,h)anthracene (SIM) | 5600 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 11. Fluoranthene (SIM) | 5900 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 12 Fluorene (SIM) | 5200 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 13. Indeno(1,2,3-cd)pyrene (SIM) | 5900 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 14. 2-Methylnaphthalene (SIM) | 5100 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 15. Phenanthrene (SIM) | 5500 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 16. Pyrene (SIM) | 5900 | | µg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |

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Order: 62801 Page: 15 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: **GSB-5 @ 2 MSD** Chain of Custody: 113540 Client Project Name: SCCBRA(16) Sample No: 6 Collect Date: 06/18/14 Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 12:20 Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted. Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis. Dry Weight Determination (ASTM D 2974-87) Aliquot ID: 62801-006A Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 1. Percent Moisture (Water Content) 06/24/14 18 % 0.1 06/23/14 MC140623 MC140623 BMG 1.0 Aliquot ID: 62801-006A Michigan 10 Elements by ICP/MS (EPA 0200.2-M/EPA 6020A) Matrix: Soil/Solid Preparation Analysis Parameter(s) Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Result Init. 06/24/14 PT14F24M T214F25A JLP 1. Arsenic 10000 μg/kg 100 20 06/25/14 2. Barium 61000 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP PT14F24M 3. Cadmium 9700 50 20 06/24/14 06/25/14 T214F25A JLP µg/kg 25000 500 20 06/24/14 PT14F24M 06/25/14 T214F25A 4. Chromium µg/kg JI P 5. Copper 32000 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 6 Lead 43000 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JI P μg/kg 7. Selenium 9000 200 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP µg/kg T214F25A 8 Silver 9200 100 20 06/24/14 PT14F24M 06/25/14 JI P μg/kg 82000 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 9. Zinc µg/kg Mercury by CVAAS (EPA 7471B) Aliquot ID: 62801-006A Matrix: Soil/Solid Preparation Analysis O Parameter(s) Dilution P. Date Result Units Reporting Limit P. Batch A. Date A. Batch Init 1. Mercury 250 50 8.8 06/24/14 PM14F24B 06/25/14 M614F25A JLH ua/ka Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) Aliquot ID: 62801-006 Matrix: Soil/Solid Preparation Analysis O Parameter(s) Result Units Reporting Limit Dilution P. Date P Batch A. Date A. Batch Init 3600 1000 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD 1. Acetone ua/ka 2. Acrylonitrile 4800 μg/kg 120 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD 3 Benzene 5600 61 1.0 06/23/14 V.J14F23A 06/23/14 VJ14F23A CCD μg/kg 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD 4. Bromobenzene 5600 μg/kg 100 1.0 06/23/14 VJ14F23A VJ14F23A CCD 5. Bromochloromethane 5100 100 1.0 06/23/14 μg/kg 6. Bromodichloromethane 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD 5600 100 1.0 µg/kg VJ14F23A CCD 7. Bromoform 5900 µg/kg 100 1.0 06/23/14 VJ14F23A 06/23/14 8. Bromomethane 6500 μg/kg 200 1.0 06/23/14 V.J14F23A 06/23/14 VJ14F23A CCD VJ14F23A VJ14F23A CCD 9. 2-Butanone 4500 750 1.0 06/23/14 06/23/14 µg/kg 10. n-Butylbenzene 7300 61 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD μg/kg 11. sec-Butylbenzene 6800 61 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD μg/kg 6700 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD 12. tert-Butvlbenzene µg/kg 61 13. Carbon Disulfide 5700 µg/kg 250 1.0 06/23/14 VJ14F23A 06/23/14 VJ14F23A CCD

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F: (810) 220-3311

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Brighton, MI 48116

Cadillac, MI 49601

1914 Holloway Drive

11766 E. Grand River

8660 S. Mackinaw Trail



Order: 62801 Page: 16 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-5 @ 2 MSD Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 6 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 12:20

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260E | 3) | | A | iquot ID: 62 | 2801-006 | Matrix: So | oil/Solid | | |
|--|--------|---------|-----------------|--------------|----------|------------|-----------|----------|-----|
| | | | | | Prepa | | | nalysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Ini |
| 14. Carbon Tetrachloride | 5900 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 15. Chlorobenzene | 5700 | μg/kg | 50 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 16. Chloroethane | 5500 | μg/kg | 300 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 17. Chloroform | 5600 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CC |
| 18. Chloromethane | 4900 | μg/kg | 300 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 19. 2-Chlorotoluene | 6100 | μg/kg | 50 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 20. Dibromochloromethane | 5900 | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 21. 1,2-Dibromo-3-chloropropane (SIM) | 5900 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 22. Dibromomethane | 5500 | μg/kg | 250 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 23. 1,2-Dichlorobenzene | 6000 | μg/kg | 120 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 24. 1,3-Dichlorobenzene | 6000 | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 25. 1,4-Dichlorobenzene | 5900 | μg/kg | 120 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |
| 26. trans-1,4-Dichloro-2-butene (SIM) | 6100 | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 27. Dichlorodifluoromethane | 5100 | μg/kg | 250 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 28. 1,1-Dichloroethane | 5300 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 29. 1,2-Dichloroethane | 5200 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 30. 1,1-Dichloroethene | 5300 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 31. cis-1,2-Dichloroethene | 5600 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 32. trans-1,2-Dichloroethene | 5500 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 33. 1,2-Dichloropropane | 5500 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 34. cis-1,3-Dichloropropene | 6200 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 35. trans-1,3-Dichloropropene | 5800 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 36. Diethyl Ether | 5200 | μg/kg | 200 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 37. Ethylbenzene | 6000 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 38. Ethylene Dibromide | 5600 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 39. Hexachloroethane | 6100 | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 40. 2-Hexanone | 5200 | μg/kg | 2500 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 41. Isopropylbenzene | 6100 | μg/kg | 300 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 42. Methylene Chloride | 4900 | μg/kg | 120 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 43. 4-Methyl-2-pentanone | 4900 | μg/kg | 2500 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 44. MTBE | 5400 | μg/kg | 250 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 45. Naphthalene | 4800 | μg/kg | 330 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 46. n-Propylbenzene | 6300 | μg/kg | 120 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 47. Styrene | 5600 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 48. 1,1,1,2-Tetrachloroethane | 5900 | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 49. 1,1,2,2-Tetrachloroethane | 5800 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 50. Tetrachloroethene | 6200 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | С |
| 51. Toluene | 5700 | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | C |

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Order: 62801 Page: 17 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-5 @ 2 MSD Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 6 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 12:20

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 82 | Al | Aliquot ID: 62801-006 | | | Matrix: Soil/Solid | | | | | |
|---|--------|-----------------------|-------|-----------------|--------------------|-------------|----------|----------|----------|-------|
| | | | | | | Preparation | | Analysis | | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 52. 1,2,4-Trichlorobenzene | 6700 | | μg/kg | 330 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 53. 1,1,1-Trichloroethane | 5800 | | μg/kg | 50 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 54. 1,1,2-Trichloroethane | 5600 | | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 55. Trichloroethene | 6000 | | μg/kg | 61 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 56. Trichlorofluoromethane | 6100 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 57. 1,2,3-Trichloropropane | 5600 | | μg/kg | 100 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| ‡ 58.1,2,3-Trimethylbenzene | 6200 | | μg/kg | 120 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 59. 1,2,4-Trimethylbenzene | 6500 | | μg/kg | 120 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 60. 1,3,5-Trimethylbenzene | 6500 | | μg/kg | 120 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 61. Vinyl Chloride | 5300 | | μg/kg | 40 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |
| 62. Xylenes | 18000 | | μg/kg | 180 | 1.0 | 06/23/14 | VJ14F23A | 06/23/14 | VJ14F23A | CCD |

| Polynuclear Aromatic Hydrocarbons (PN | ls) (EPA 3546/EPA 8270C) | | | Aliquot ID: 62801-006A | | | Matrix: So | oil/Solid | | |
|---------------------------------------|--------------------------|---|-------|------------------------|----------|----------|------------|-----------|----------|-------|
| | | | | | | Prepa | ration | A | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 1. Acenaphthene (SIM) | 6400 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 2. Acenaphthylene (SIM) | 6300 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 3. Anthracene (SIM) | 5800 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 4. Benzo(a)anthracene (SIM) | 6200 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 5. Benzo(a)pyrene (SIM) | 6200 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 6. Benzo(b)fluoranthene (SIM) | 7000 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 7. Benzo(ghi)perylene (SIM) | 7000 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 8. Benzo(k)fluoranthene (SIM) | 6700 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAI |
| 9. Chrysene (SIM) | 6600 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 10. Dibenzo(a,h)anthracene (SIM) | 7000 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 11. Fluoranthene (SIM) | 7200 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 12 Fluorene (SIM) | 6600 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 13. Indeno(1,2,3-cd)pyrene (SIM) | 7100 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 14. 2-Methylnaphthalene (SIM) | 6500 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 15. Phenanthrene (SIM) | 6700 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |
| 16. Pyrene (SIM) | 7200 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F24A | GAN |

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail

DCSID: G-610.15 (10/09/13)

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Order: 62801 Page: 18 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-1 @ 2 Chain of Custody: 113540 Client Project Name: SCCBRA(16) Sample No: 7 Collect Date: 06/18/14 Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:10 Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted. Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis. Dry Weight Determination (ASTM D 2974-87) Aliquot ID: 62801-007A Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 1. Percent Moisture (Water Content) 19 % 0.1 06/23/14 MC140623 06/24/14 MC140623 BMG 1.0 Aliquot ID: 62801-007A Michigan 10 Elements by ICP/MS (EPA 0200.2-M/EPA 6020A) Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 1400 06/24/14 PT14F24M T214F25A JLP 1. Arsenic μg/kg 100 20 06/25/14 2. Barium 29000 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP PT14F24M T214F25A 3. Cadmium 240 50 20 06/24/14 06/25/14 JLP µg/kg 3800 500 20 06/24/14 PT14F24M 06/25/14 T214F25A 4. Chromium µg/kg JI P 5. Copper 20000 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 6 Lead 20000 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JI P μg/kg 7. Selenium 220 200 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP µg/kg T214F25A 8 Silver 100 20 06/24/14 PT14F24M 06/25/14 JI P U μg/kg 9. Zinc 27000 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP µg/kg Mercury by CVAAS (EPA 7471B) Aliquot ID: 62801-007A Matrix: Soil/Solid Preparation Analysis Reporting Limit Parameter(s) Result O Dilution P. Date Units P. Batch A. Date A. Batch Init 1. Mercury U μg/kg 50 8.9 06/24/14 PM14F24A 06/25/14 M614F25A JLH Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) Aliquot ID: 62801-007 Matrix: Soil/Solid Preparation Analysis Q Parameter(s) Result Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init U 1000 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 1. Acetone ua/ka 2. Acrylonitrile U μg/kg 120 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 3 Benzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 4. Bromobenzene μg/kg 100 1.0 5. Bromochloromethane U 06/20/14 VH14F20B VH14F20B CCD 120 1.0 06/21/14 μg/kg 6. Bromodichloromethane U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg 100 1.0 7. Bromoform U μg/kg 120 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 8. Bromomethane U μg/kg 200 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD п VH14F20B VH14F20B CCD 9. 2-Butanone 750 1.0 06/20/14 06/21/14 µg/kg 10. n-Butylbenzene U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 50 μg/kg 11. sec-Butylbenzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 12. tert-Butvlbenzene μg/kg 50 13. Carbon Disulfide U µg/kg 250 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 1914 Holloway Drive Holt, MI 48842 T: (517) 699-0345 F: (517) 699-0388

Brighton, MI 48116

Cadillac, MI 49601

11766 E. Grand River

8660 S. Mackinaw Trail

DCSID: G-610.15 (10/09/13)

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T: (810) 220-3300

T: (231) 775-8368



Order: 62801 Page: 19 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-1 @ 2 Chain of Custody: 113540

 Client Project Name:
 SCCBRA(16)
 Sample No:
 7
 Collect Date:
 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:10

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) | | | | | | 801-007 | Matrix: So | oil/Solid | | |
|---|--------|---|-------|-----------------|----------|----------|------------|-----------|----------|------|
| | | | | | | Prepa | ration | | Analysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init |
| 14. Carbon Tetrachloride | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 15. Chlorobenzene | U | | μg/kg | 62 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 16. Chloroethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 17. Chloroform | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 18. Chloromethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 19. 2-Chlorotoluene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 20. Dibromochloromethane | U | | μg/kg | 120 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 21.1,2-Dibromo-3-chloropropane (SIM) | U | | μg/kg | 62 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 22. Dibromomethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 23. 1,2-Dichlorobenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 24. 1,3-Dichlorobenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 25. 1,4-Dichlorobenzene | U | | μg/kg | 120 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 27. Dichlorodifluoromethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 28. 1,1-Dichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 29. 1,2-Dichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 30. 1,1-Dichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 31. cis-1,2-Dichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 32. trans-1,2-Dichloroethene | U | | μg/kg | 62 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 33. 1,2-Dichloropropane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 34. cis-1,3-Dichloropropene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 35. trans-1,3-Dichloropropene | U | | μg/kg | 62 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 36. Diethyl Ether | U | | μg/kg | 200 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 37. Ethylbenzene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 38. Ethylene Dibromide | U | | μg/kg | 62 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 39. Hexachloroethane | U | | μg/kg | 120 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 40. 2-Hexanone | U | | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 41. Isopropylbenzene | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 42. Methylene Chloride | U | | μg/kg | 120 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 43. 4-Methyl-2-pentanone | U | | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 44. MTBE | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 45. Naphthalene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 46. n-Propylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 47. Styrene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 48. 1,1,1,2-Tetrachloroethane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 49. 1,1,2,2-Tetrachloroethane | U | | μg/kg | 62 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 50. Tetrachloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 51. Toluene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |

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Order: 62801 Page: 20 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-1 @ 2 Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 7 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:10

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 826 | Al | Aliquot ID: 62801-007 | | | Matrix: Soil/Solid | | | | | |
|--|--------|-----------------------|-------|-----------------|--------------------|----------|----------|----------|----------|-------|
| | | | | | | Prepa | ration | Analysis | | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 52. 1,2,4-Trichlorobenzene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 53. 1,1,1-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 54. 1,1,2-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 55. Trichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 56. Trichlorofluoromethane | U | | μg/kg | 120 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 57. 1,2,3-Trichloropropane | U | | μg/kg | 120 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 58. 1,2,3-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 59. 1,2,4-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 60. 1,3,5-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 61. Vinyl Chloride | U | | μg/kg | 40 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 62. Xylenes | U | | μg/kg | 150 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |

| Polynuclear Aromatic Hydrocarbons (PNAs) (EPA 3546/EPA 8270C) | | | Al | liquot ID: 62 | 2801-007A | Matrix: Soil/Solid | | | | |
|---|--------|---|-------|-----------------|-----------|--------------------|----------|----------|----------|-------|
| | | | | | | Prepa | ration | Д | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| 1. Acenaphthene (SIM) | 2500 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 2. Acenaphthylene (SIM) | 700 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 3. Anthracene (SIM) | 4400 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 4. Benzo(a)anthracene (SIM) | 8200 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 5. Benzo(a)pyrene (SIM) | 8500 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| 6. Benzo(b)fluoranthene (SIM) | 10000 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| 7. Benzo(ghi)perylene (SIM) | 5100 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| 8. Benzo(k)fluoranthene (SIM) | 3600 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| 9. Chrysene (SIM) | 7400 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| 10. Dibenzo(a,h)anthracene (SIM) | 1400 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| 11. Fluoranthene (SIM) | 19000 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| 12. Fluorene (SIM) | 2600 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| 13. Indeno(1,2,3-cd)pyrene (SIM) | 5500 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| 14. 2-Methylnaphthalene (SIM) | 1800 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| 15. Phenanthrene (SIM) | 17000 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| 16. Pyrene (SIM) | 16000 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TM |
| | | | | | | | | | | |

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Order: 62801 Page: 21 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-2 @ 2 Chain of Custody: 113540 Client Project Name: SCCBRA(16) Sample No: 8 Collect Date: 06/18/14 Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:25 Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted. Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis. Dry Weight Determination (ASTM D 2974-87) Aliquot ID: 62801-008A Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 1. Percent Moisture (Water Content) 11 % 0.1 06/23/14 MC140623 06/24/14 MC140623 BMG 1.0 Aliquot ID: 62801-008A Michigan 10 Elements by ICP/MS (EPA 0200.2-M/EPA 6020A) Matrix: Soil/Solid Preparation Analysis Parameter(s) Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Result Init. 9400 06/24/14 PT14F24M T214F25A JLP 1. Arsenic μg/kg 100 20 06/25/14 2. Barium 500000 μg/kg 10000 200 06/25/14 PT14F24M 06/25/14 T214F25A JLP PT14F24M T214F25A 3. Cadmium 4200 50 20 06/24/14 06/25/14 JLP µg/kg 23000 500 20 06/24/14 PT14F24M 06/25/14 T214F25A 4. Chromium µg/kg JI P 5. Copper 170000 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 6 Lead 770000 1000 200 06/25/14 PT14F24M 06/25/14 T214F25A JI P μg/kg 7. Selenium 1300 200 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP µg/kg T214F25A 8 Silver 100 20 06/24/14 PT14F24M 06/25/14 JI P 1000 μg/kg 9. Zinc 1000000 10000 200 06/25/14 PT14F24M 06/25/14 T214F25A JLP µg/kg Mercury by CVAAS (EPA 7471B) Aliquot ID: 62801-008A Matrix: Soil/Solid Preparation Analysis O Reporting Limit Parameter(s) Result Dilution P. Date Units P. Batch A. Date A. Batch Init 1. Mercury 690 μg/kg 50 9.6 06/24/14 PM14F24A 06/25/14 M614F25A JLH Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) Aliquot ID: 62801-008 Matrix: Soil/Solid Preparation Analysis Q Parameter(s) Result Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init U 1000 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 1. Acetone ua/ka 2. Acrylonitrile U μg/kg 110 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 3 Benzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 4. Bromobenzene μg/kg 100 1.0 U 06/20/14 VH14F20B VH14F20B CCD 5. Bromochloromethane 110 1.0 06/21/14 μg/kg 6. Bromodichloromethane U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg 100 1.0 7. Bromoform U μg/kg 110 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 8. Bromomethane U μg/kg 200 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD п VH14F20B VH14F20B CCD 9. 2-Butanone 750 1.0 06/20/14 06/21/14 µg/kg 10. n-Butylbenzene U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 50 μg/kg 11. sec-Butylbenzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 12. tert-Butvlbenzene μg/kg 50 13. Carbon Disulfide U µg/kg 250 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 1914 Holloway Drive Holt, MI 48842 T: (517) 699-0345 F: (517) 699-0388

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Cadillac, MI 49601

11766 E. Grand River

8660 S. Mackinaw Trail



Order: 62801 Page: 22 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-2 @ 2 Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 8 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:25

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) | | | | A | liquot ID: 62 | 2801-008 | Matrix: So | oil/Solid | | |
|---|--------|---|-------|-----------------|---------------|----------|------------|-----------|----------|------|
| | | | | | | Prepa | ration | | Analysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init |
| 14. Carbon Tetrachloride | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 15. Chlorobenzene | U | | μg/kg | 56 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 16. Chloroethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 17. Chloroform | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 18. Chloromethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 19. 2-Chlorotoluene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 20. Dibromochloromethane | U | | µg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| ‡ 21.1,2-Dibromo-3-chloropropane (SIM) | U | | µg/kg | 56 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 22. Dibromomethane | U | | µg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 23. 1,2-Dichlorobenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 24. 1,3-Dichlorobenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 25. 1,4-Dichlorobenzene | 2200 | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 27. Dichlorodifluoromethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 28. 1,1-Dichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 29. 1,2-Dichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 30. 1,1-Dichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 31. cis-1,2-Dichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 32. trans-1,2-Dichloroethene | U | | μg/kg | 56 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 33.1,2-Dichloropropane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 34. cis-1,3-Dichloropropene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 35. trans-1,3-Dichloropropene | U | | μg/kg | 56 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 36. Diethyl Ether | U | | μg/kg | 200 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 37. Ethylbenzene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 38. Ethylene Dibromide | U | | μg/kg | 56 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 39. Hexachloroethane | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 40. 2-Hexanone | U | | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 41. Isopropylbenzene | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 42. Methylene Chloride | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 43. 4-Methyl-2-pentanone | U | | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 44. MTBE | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 45. Naphthalene | U | | µg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 46. n-Propylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 47. Styrene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 48.1,1,1,2-Tetrachloroethane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 49. 1,1,2,2-Tetrachloroethane | U | | μg/kg | 56 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 50. Tetrachloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 51. Toluene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |

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Order: 62801 23 of 49 Page: Date: 06/26/14

06/18/14

Collect Date:

Envirologic Technologies, Inc. 113540 Client Identification: Sample Description: GSB-2 @ 2 Chain of Custody: Client Project Name: SCCBRA(16)

140273 Sample Matrix: Soil/Solid Collect Time: Client Project No: 13:25

Soil results have been calculated and reported on a dry weight basis unless otherwise noted. Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Sample No:

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) | | | | A | iquot ID: 62 | 2801-008 | Matrix: So | oil/Solid | |
|---|--------|---|-------|-----------------|--------------|----------|------------|-----------|-------------|
| | | | | | | Prepa | ration | Д | Analysis |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch In |
| 52. 1,2,4-Trichlorobenzene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B CC |
| 53.1,1,1-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B CC |
| 54. 1,1,2-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B CC |
| 55. Trichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B CC |
| 56. Trichlorofluoromethane | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B CC |
| 57. 1,2,3-Trichloropropane | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B CC |
| ‡ 58.1,2,3-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B CC |
| 59. 1,2,4-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B CC |
| 60. 1,3,5-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B CC |
| 61. Vinyl Chloride | U | | μg/kg | 40 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B CC |
| 62. Xylenes | U | | μg/kg | 150 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B CC |

| Polynuclear Aromatic Hydrocarbons (PN | IAs) (EPA 3546/I | EPA 82 | 270C) | Aliquot ID: 62801-008A | | 801-008A | Matrix: So | oil/Solid | | |
|---------------------------------------|------------------|--------|-------|------------------------|----------|----------|------------|-----------|----------|-------|
| | | | | | | Prepa | ration | Д | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| 1. Acenaphthene (SIM) | U | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 2. Acenaphthylene (SIM) | U | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 3. Anthracene (SIM) | U | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 4. Benzo(a)anthracene (SIM) | 650 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 5. Benzo(a)pyrene (SIM) | 500 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 6. Benzo(b)fluoranthene (SIM) | 860 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 7. Benzo(ghi)perylene (SIM) | 480 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 8. Benzo(k)fluoranthene (SIM) | U | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 9. Chrysene (SIM) | 660 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 10. Dibenzo(a,h)anthracene (SIM) | U | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 11. Fluoranthene (SIM) | 1300 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 12 Fluorene (SIM) | U | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 13. Indeno(1,2,3-cd)pyrene (SIM) | 430 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 14. 2-Methylnaphthalene (SIM) | 600 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 15. Phenanthrene (SIM) | 1100 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |
| 16. Pyrene (SIM) | 1200 | | μg/kg | 330 | 20 | 06/23/14 | PS14F23F | 06/24/14 | S614F23A | TMC |

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Order: 62801 Page: 24 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-3 @ 2 Chain of Custody: 113540 Client Project Name: SCCBRA(16) Sample No: 9 Collect Date: 06/18/14 Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:40 Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted. Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis. Dry Weight Determination (ASTM D 2974-87) Aliquot ID: 62801-009A Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 1. Percent Moisture (Water Content) 5.6 % 0.1 06/23/14 MC140623 06/24/14 MC140623 BMG 1.0 Aliquot ID: 62801-009A Michigan 10 Elements by ICP/MS (EPA 0200.2-M/EPA 6020A) Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 1. Arsenic 910 06/24/14 PT14F24M T214F25A JLP μg/kg 100 20 06/25/14 2. Barium 11000 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP PT14F24M T214F25A 3. Cadmium 82 50 20 06/24/14 06/25/14 JLP µg/kg 3800 500 20 06/24/14 PT14F24M 06/25/14 T214F25A 4. Chromium µg/kg JI P 5. Copper 6100 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 6 Lead 7500 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JI P μg/kg 7. Selenium U 200 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP µg/kg T214F25A 8 Silver IJ 100 20 06/24/14 PT14F24M 06/25/14 JI P μg/kg 9. Zinc 14000 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP µg/kg Mercury by CVAAS (EPA 7471B) Aliquot ID: 62801-009A Matrix: Soil/Solid Preparation Analysis Reporting Limit Parameter(s) Result O Dilution P. Date Units P. Batch A. Date A. Batch Init 1. Mercury U μg/kg 50 9.2 06/24/14 PM14F24A 06/25/14 M614F25A JLH Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) Aliquot ID: 62801-009 Matrix: Soil/Solid Preparation Analysis Q Parameter(s) Result Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init U 1000 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 1. Acetone ua/ka 2. Acrylonitrile U μg/kg 110 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 3 Benzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 4. Bromobenzene μg/kg 100 1.0 U 06/20/14 VH14F20B VH14F20B CCD 5. Bromochloromethane 110 1.0 06/21/14 μg/kg 6. Bromodichloromethane U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg 100 1.0 7. Bromoform U μg/kg 110 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 8. Bromomethane U μg/kg 200 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD п VH14F20B VH14F20B CCD 9. 2-Butanone 750 1.0 06/20/14 06/21/14 µg/kg 10. n-Butylbenzene U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 50 μg/kg 11. sec-Butylbenzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 12. tert-Butvlbenzene μg/kg 50 13. Carbon Disulfide U µg/kg 250 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD

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Brighton, MI 48116

Cadillac, MI 49601

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11766 E. Grand River

8660 S. Mackinaw Trail



Order: 62801 Page: 25 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-3 @ 2 Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 9 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:40

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) | | | A | liquot ID: 62 | 2801-009 | Matrix: So | oil/Solid | | |
|---|--------|---------|-----------------|---------------|----------|------------|-----------|----------|-----|
| | | | | | Prepa | | | nalysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Ini |
| 14. Carbon Tetrachloride | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 15. Chlorobenzene | U | μg/kg | 53 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 16. Chloroethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 17. Chloroform | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 18. Chloromethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 19. 2-Chlorotoluene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 20. Dibromochloromethane | U | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 21. 1,2-Dibromo-3-chloropropane (SIM) | U | μg/kg | 53 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 22. Dibromomethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 23. 1,2-Dichlorobenzene | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 24. 1,3-Dichlorobenzene | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 25. 1,4-Dichlorobenzene | U | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 27. Dichlorodifluoromethane | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | С |
| 28. 1,1-Dichloroethane | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 29. 1,2-Dichloroethane | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 30. 1,1-Dichloroethene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 31. cis-1,2-Dichloroethene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | С |
| 32 trans-1,2-Dichloroethene | U | μg/kg | 53 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 33. 1,2-Dichloropropane | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | С |
| 34. cis-1,3-Dichloropropene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 35. trans-1,3-Dichloropropene | U | μg/kg | 53 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 36. Diethyl Ether | U | μg/kg | 200 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 37. Ethylbenzene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 38. Ethylene Dibromide | U | μg/kg | 53 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 39. Hexachloroethane | U | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 40. 2-Hexanone | U | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 41. Isopropylbenzene | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 42. Methylene Chloride | U | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 43. 4-Methyl-2-pentanone | U | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 44. MTBE | U | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | С |
| 45. Naphthalene | U | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 46. n-Propylbenzene | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 47. Styrene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 48. 1,1,1,2-Tetrachloroethane | U | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | 3 C |
| 49. 1,1,2,2-Tetrachloroethane | U | μg/kg | 53 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 50. Tetrachloroethene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 51. Toluene | U | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |

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Client Project Name: SCCBRA(16)

Analytical Laboratory Report Laboratory Project Number: 62801 Laboratory Sample Number: 62801-009

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Order: 62801 Page: 26 of 49 Date: 06/26/14

06/18/14

Collect Date:

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-3 @ 2 Chain of Custody: 113540

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:40

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Sample No:

| Plus List (VOCs), 5035 (EPA 5035/EPA 8 | us List (VOCs), 5035 (EPA 5035/EPA 8260B) | | | A | Aliquot ID: 62801-009 | | Matrix: Soil/Solid | | · | |
|--|---|---|-------|-----------------|-----------------------|----------|--------------------|----------|----------|-------|
| | | | | | | Prepa | ration | Α | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 52.1,2,4-Trichlorobenzene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 53.1,1,1-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 54.1,1,2-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 55. Trichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 56. Trichlorofluoromethane | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 57. 1,2,3-Trichloropropane | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| ‡ 58.1,2,3-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 59. 1,2,4-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 60. 1,3,5-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 61. Vinyl Chloride | U | | μg/kg | 40 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 62. Xylenes | U | | μg/kg | 150 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |

| Polynuclear Aromatic Hydrocarbons (| PNAs) (EPA 3546/I | (EPA 3546/EPA 8270C) | | | Aliquot ID: 62801-009A | | A Matrix: Soil/Solid | | | |
|-------------------------------------|-------------------|----------------------|-------|-----------------|------------------------|----------|----------------------|----------|----------|-------|
| | | | | | | Prepa | ration | Д | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| 1. Acenaphthene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BDA |
| 2. Acenaphthylene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD |
| 3. Anthracene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD |
| 4. Benzo(a)anthracene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD |
| 5. Benzo(a)pyrene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD |
| 6. Benzo(b)fluoranthene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD. |
| 7. Benzo(ghi)perylene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD. |
| 8. Benzo(k)fluoranthene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD |
| 9. Chrysene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD. |
| 10. Dibenzo(a,h)anthracene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD. |
| 11. Fluoranthene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD. |
| 12. Fluorene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD |
| 13. Indeno(1,2,3-cd)pyrene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD |
| 14. 2-Methylnaphthalene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD |
| 15. Phenanthrene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD |
| 16. Pyrene | U | | μg/kg | 330 | 1.0 | 06/23/14 | PS14F23F | 06/23/14 | S514F23A | BD |

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Order: 62801 Page: 27 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-4 @ 2 Chain of Custody: 113540 Client Project Name: SCCBRA(16) Sample No: 10 Collect Date: 06/18/14 Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:55 Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted. Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis. Dry Weight Determination (ASTM D 2974-87) Aliquot ID: 62801-010A Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 1. Percent Moisture (Water Content) 8.3 % 0.1 06/23/14 MC140623 06/24/14 MC140623 BMG 1.0 Aliquot ID: 62801-010A Michigan 10 Elements by ICP/MS (EPA 0200.2-M/EPA 6020A) Matrix: Soil/Solid Preparation Analysis Parameter(s) Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Result Init. 06/24/14 PT14F24M T214F25A JLP 1. Arsenic 1800 μg/kg 100 20 06/25/14 2. Barium 34000 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP PT14F24M T214F25A 3. Cadmium 160 50 20 06/24/14 06/25/14 JLP µg/kg 4400 500 20 06/24/14 PT14F24M 06/25/14 T214F25A 4. Chromium µg/kg JI P 5. Copper 15000 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 6 Lead 21000 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JI P μg/kg 7. Selenium U 200 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP µg/kg T214F25A 8 Silver U 100 20 06/24/14 PT14F24M 06/25/14 JI P μg/kg 30000 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 9. Zinc µg/kg Mercury by CVAAS (EPA 7471B) Aliquot ID: 62801-010A Matrix: Soil/Solid Preparation Analysis Reporting Limit Parameter(s) Result O Dilution P. Date Units P. Batch A. Date A. Batch Init 1. Mercury U μg/kg 50 9.7 06/24/14 PM14F24A 06/25/14 M614F25A JLH Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) Aliquot ID: 62801-010 Matrix: Soil/Solid Preparation Analysis Q Parameter(s) Result Units Reporting Limit Dilution P. Date P Batch A. Date A. Batch Init U 1000 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 1. Acetone ua/ka 2. Acrylonitrile U μg/kg 110 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 3 Benzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 4. Bromobenzene μg/kg 100 1.0 5. Bromochloromethane U 06/20/14 VH14F20B VH14F20B CCD 110 1.0 06/21/14 μg/kg 6. Bromodichloromethane U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg 100 1.0 7. Bromoform U μg/kg 110 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 8. Bromomethane U μg/kg 200 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD п VH14F20B VH14F20B CCD 9. 2-Butanone 750 1.0 06/20/14 06/21/14 µg/kg 10. n-Butylbenzene U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 50 μg/kg 11. sec-Butylbenzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 12. tert-Butvlbenzene μg/kg 50 13. Carbon Disulfide U µg/kg 250 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 1914 Holloway Drive Holt, MI 48842 T: (517) 699-0345 F: (517) 699-0388

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T: (231) 775-8368

F: (810) 220-3311

F: (231) 775-8584

Brighton, MI 48116

Cadillac, MI 49601

11766 E. Grand River

8660 S. Mackinaw Trail



Order: 62801 Page: 28 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-4 @ 2 Chain of Custody: 113540

 Client Project Name:
 SCCBRA(16)
 Sample No:
 10
 Collect Date:
 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:55

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260 | B) | | | Al | iquot ID: 62 | 801-010 | Matrix: So | oil/Solid | | |
|---|--------|---|-------|-----------------|--------------|----------|------------|-----------|----------|------|
| | | | | | | Prepa | | | Analysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init |
| 14. Carbon Tetrachloride | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 15. Chlorobenzene | U | | μg/kg | 55 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 16. Chloroethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 17. Chloroform | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 18. Chloromethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 19. 2-Chlorotoluene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 20. Dibromochloromethane | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| ‡ 21.1,2-Dibromo-3-chloropropane (SIM) | U | | μg/kg | 55 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 22. Dibromomethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 23. 1,2-Dichlorobenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 24. 1,3-Dichlorobenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 25. 1,4-Dichlorobenzene | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCI |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | СС |
| 27. Dichlorodifluoromethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 28. 1,1-Dichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 29. 1,2-Dichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 30. 1,1-Dichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 31. cis-1,2-Dichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 32. trans-1,2-Dichloroethene | U | | μg/kg | 55 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 33. 1,2-Dichloropropane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 34. cis-1,3-Dichloropropene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 35. trans-1,3-Dichloropropene | U | | μg/kg | 55 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 36. Diethyl Ether | U | | μg/kg | 200 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 37. Ethylbenzene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 38. Ethylene Dibromide | U | | μg/kg | 55 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 39. Hexachloroethane | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 40. 2-Hexanone | U | | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 41. Isopropylbenzene | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 42. Methylene Chloride | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 43. 4-Methyl-2-pentanone | U | | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 44. MTBE | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 45. Naphthalene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 46. n-Propylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 47. Styrene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 48.1,1,1,2-Tetrachloroethane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 49. 1,1,2,2-Tetrachloroethane | U | | μg/kg | 55 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 50. Tetrachloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 51. Toluene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |

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RSN: 62801-140626153334



Order: 62801 Page: 29 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: GSB-4 @ 2 Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 10 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:55

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8 | us List (VOCs), 5035 (EPA 5035/EPA 8260B) | | | A | Aliquot ID: 62801-010 | | Matrix: Soil/Solid | | · | |
|--|---|---|-------|-----------------|-----------------------|----------|--------------------|----------|----------|-------|
| | | | | | | Prepa | ration | Д | Analysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 52.1,2,4-Trichlorobenzene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 53.1,1,1-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 54.1,1,2-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 55. Trichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 56. Trichlorofluoromethane | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 57. 1,2,3-Trichloropropane | U | | μg/kg | 110 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| ‡ 58.1,2,3-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 59. 1,2,4-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 60. 1,3,5-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 61. Vinyl Chloride | U | | μg/kg | 40 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 62. Xylenes | U | | μg/kg | 150 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |

| Polynuclear Aromatic Hydrocarbons (PN | IAs) (EPA 3546/ | EPA 82 | 270C) | Α | liquot ID: 62 | 2801-010A | Matrix: So | oil/Solid | | |
|---------------------------------------|-----------------|--------|-------|-----------------|---------------|-----------|------------|-----------|----------|-------|
| | | | | | | Prepa | ration | Д | Analysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 1. Acenaphthene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 2. Acenaphthylene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 3. Anthracene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 4. Benzo(a)anthracene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 5. Benzo(a)pyrene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 6. Benzo(b)fluoranthene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 7. Benzo(ghi)perylene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 8. Benzo(k)fluoranthene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 9. Chrysene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 10. Dibenzo(a,h)anthracene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 11. Fluoranthene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 12. Fluorene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 13. Indeno(1,2,3-cd)pyrene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 14. 2-Methylnaphthalene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 15. Phenanthrene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 16. Pyrene (SIM) | U | | µg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |

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RSN: 62801-140626153334



Order: 62801 Page: 30 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: EB-1s Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 11 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Ground Water Collect Time: 15:05

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | A | liquot ID: 62 | 2801-011 | Matrix: G | round Water | | |
|--|--------|---------|-----------------|---------------|----------|-----------|-------------|----------|------|
| | | | | | Prepa | ration | Δ | nalysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init |
| 1. Acetone | U | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 2. Acrylonitrile | U | μg/L | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 3. Benzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 4. Bromobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 5. Bromochloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 6. Bromodichloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 7. Bromoform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 8. Bromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 9. 2-Butanone | U | μg/L | 25 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 10. n-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 11. sec-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 12. tert-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 13. Carbon Disulfide | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 14. Carbon Tetrachloride | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 15. Chlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 16. Chloroethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 17. Chloroform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 18. Chloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 19. 2-Chlorotoluene | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 20. Dibromochloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 21. 1,2-Dibromo-3-chloropropane (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 22. Dibromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JI |
| 23. 1,2-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 24. 1,3-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 25. 1,4-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 27. Dichlorodifluoromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 28. 1,1-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 29. 1,2-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 30. 1,1-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 31. cis-1,2-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 32. trans-1,2-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 33. 1,2-Dichloropropane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 34. cis-1,3-Dichloropropene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 35. trans-1,3-Dichloropropene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 36. Diethyl Ether | U | μg/L | 10 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 37. Ethylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 38. Ethylene Dibromide | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |

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Order: 62801 Page: 31 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: EB-1s Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 11 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Ground Water Collect Time: 15:05

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | A | liquot ID: 6 | 2801-011 | Matrix: G | round Water | | |
|--|--------|---------|-----------------|--------------|----------|-----------|-------------|----------|-------|
| | | | | | Prepa | | | nalysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| ‡ 39. Hexachloroethane | U | μg/L | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 40. 2-Hexanone | U | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 41. Isopropylbenzene | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 42. Methylene Chloride | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 43. 2-Methylnaphthalene | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 44. 4-Methyl-2-pentanone | U | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 45. MTBE | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 46. Naphthalene | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 47. n-Propylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 48. Styrene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 49. 1,1,1,2-Tetrachloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 50. 1,1,2,2-Tetrachloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 51. Tetrachloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 52. Toluene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 53. 1,2,4-Trichlorobenzene | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 54. 1,1,1-Trichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 55. 1,1,2-Trichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 56. Trichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 57. Trichlorofluoromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 58. 1,2,3-Trichloropropane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 59.1,2,3-Trimethylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 60. 1,2,4-Trimethylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 61. 1,3,5-Trimethylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 62. Vinyl Chloride | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 63. Xylenes | U | μg/L | 3.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |



Order: 62801 Page: 32 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: M-1s Chain of Custody: 113540 Client Project Name: SCCBRA(16) Sample No: 12 Collect Date: 06/18/14 Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: NA Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted. Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis. Dry Weight Determination (ASTM D 2974-87) Aliquot ID: 62801-012A Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 1. Percent Moisture (Water Content) 3.2 % 0.1 06/23/14 MC140623 06/24/14 MC140623 BMG 1.0 Aliquot ID: 62801-012A Michigan 10 Elements by ICP/MS (EPA 0200.2-M/EPA 6020A) Matrix: Soil/Solid Preparation Analysis Parameter(s) Result Q Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init. 06/24/14 PT14F24M T214F25A JLP 1. Arsenic 520 μg/kg 100 20 06/25/14 2. Barium 6500 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP П PT14F24M T214F25A 3. Cadmium 50 20 06/24/14 06/25/14 JLP µg/kg 3200 500 20 06/24/14 PT14F24M 06/25/14 T214F25A 4. Chromium µg/kg JI P 5. Copper 1900 μg/kg 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 6 Lead 1200 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JI P μg/kg 7. Selenium U 200 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP µg/kg T214F25A 8 Silver IJ 100 20 06/24/14 PT14F24M 06/25/14 JI P μg/kg 7200 1000 20 06/24/14 PT14F24M 06/25/14 T214F25A JLP 9. Zinc µg/kg Mercury by CVAAS (EPA 7471B) Aliquot ID: 62801-012A Matrix: Soil/Solid Preparation Analysis Reporting Limit Parameter(s) Result O Dilution P. Date Units P. Batch A. Date A. Batch Init 1. Mercury U μg/kg 50 9.5 06/24/14 PM14F24A 06/25/14 M614F25A JLH Plus List (VOCs), 5035 (EPA 5035/EPA 8260B) Aliquot ID: 62801-012 Matrix: Soil/Solid Preparation Analysis Q Parameter(s) Result Units Reporting Limit Dilution P. Date P. Batch A. Date A. Batch Init U 1000 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 1. Acetone ua/ka 2. Acrylonitrile U μg/kg 100 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 3 Benzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 4. Bromobenzene μg/kg 100 1.0 U 06/20/14 VH14F20B VH14F20B CCD 5. Bromochloromethane 100 1.0 06/21/14 μg/kg 6. Bromodichloromethane U 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg 100 1.0 7. Bromoform U μg/kg 100 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 8. Bromomethane U μg/kg 200 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD п VH14F20B VH14F20B CCD 9. 2-Butanone 750 1.0 06/20/14 06/21/14 µg/kg 10. n-Butylbenzene U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 50 μg/kg 11. sec-Butylbenzene U 50 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD μg/kg U 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD 12. tert-Butvlbenzene μg/kg 50 13. Carbon Disulfide U µg/kg 250 1.0 06/20/14 VH14F20B 06/21/14 VH14F20B CCD

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Brighton, MI 48116

Cadillac, MI 49601

1914 Holloway Drive

11766 E. Grand River

8660 S. Mackinaw Trail



Order: 62801 Page: 33 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: M-1s Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 12 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: NA

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260 | B) | | | A | iquot ID: 62 | 801-012 | Matrix: So | oil/Solid | | |
|---|--------|---|-------|-----------------|--------------|----------|------------|-----------|----------|------|
| | | | | | | Prepa | ration | | Analysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init |
| 14. Carbon Tetrachloride | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 15. Chlorobenzene | U | | μg/kg | 52 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 16. Chloroethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 17. Chloroform | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 18. Chloromethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 19. 2-Chlorotoluene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 20. Dibromochloromethane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| ‡ 21.1,2-Dibromo-3-chloropropane (SIM) | U | | μg/kg | 52 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 22. Dibromomethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 23. 1,2-Dichlorobenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 24. 1,3-Dichlorobenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 25. 1,4-Dichlorobenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 27. Dichlorodifluoromethane | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 28. 1,1-Dichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 29. 1,2-Dichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 30. 1,1-Dichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 31. cis-1,2-Dichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 32. trans-1,2-Dichloroethene | U | | μg/kg | 52 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 33. 1,2-Dichloropropane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 34. cis-1,3-Dichloropropene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 35. trans-1,3-Dichloropropene | U | | μg/kg | 52 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 36. Diethyl Ether | U | | μg/kg | 200 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 37. Ethylbenzene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 38. Ethylene Dibromide | U | | μg/kg | 52 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CC |
| 39. Hexachloroethane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 40. 2-Hexanone | U | | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 41. Isopropylbenzene | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 42. Methylene Chloride | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 43. 4-Methyl-2-pentanone | U | | μg/kg | 2500 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 44. MTBE | U | | μg/kg | 250 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 45. Naphthalene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | C |
| 46. n-Propylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 47. Styrene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 48. 1,1,1,2-Tetrachloroethane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 49. 1,1,2,2-Tetrachloroethane | U | | μg/kg | 52 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 50. Tetrachloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |
| 51. Toluene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | |

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Order: 62801 Page: 34 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: M-1s Chain of Custody: 113540

Client Project Name: SCCBRA(16) Sample No: 12 Collect Date: 06/18/14

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: NA

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs), 5035 (EPA 5035/EPA 8260 | В) | | | Al | iquot ID: 62 | 2801-012 | Matrix: So | oil/Solid | | |
|---|--------|---|-------|-----------------|--------------|----------|------------|-----------|----------|-------|
| | | | | | | Prepa | ration | Α | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 52. 1,2,4-Trichlorobenzene | U | | μg/kg | 330 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 53.1,1,1-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 54. 1,1,2-Trichloroethane | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 55. Trichloroethene | U | | μg/kg | 50 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 56. Trichlorofluoromethane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 57. 1,2,3-Trichloropropane | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| ‡ 58.1,2,3-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 59. 1,2,4-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 60. 1,3,5-Trimethylbenzene | U | | μg/kg | 100 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 61. Vinyl Chloride | U | | μg/kg | 40 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |
| 62. Xylenes | U | | μg/kg | 150 | 1.0 | 06/20/14 | VH14F20B | 06/21/14 | VH14F20B | CCD |

| Polynuclear Aromatic Hydrocarbons (PN | IAs) (EPA 3546/ | EPA 8 | 270C) | A | liquot ID: 62 | 2801-012A | Matrix: So | oil/Solid | | |
|---------------------------------------|-----------------|-------|-------|-----------------|---------------|-----------|------------|-----------|----------|-------|
| | | | | | | Prepa | ration | Д | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 1. Acenaphthene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 2. Acenaphthylene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 3. Anthracene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 4. Benzo(a)anthracene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 5. Benzo(a)pyrene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 6. Benzo(b)fluoranthene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 7. Benzo(ghi)perylene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 8. Benzo(k)fluoranthene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 9. Chrysene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 10. Dibenzo(a,h)anthracene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 11. Fluoranthene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 12. Fluorene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 13. Indeno(1,2,3-cd)pyrene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 14. 2-Methylnaphthalene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 15. Phenanthrene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |
| 16. Pyrene (SIM) | U | | μg/kg | 330 | 20 | 06/24/14 | PS14F24A | 06/25/14 | S614F24B | GAN |

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Order: 62801 Page: 35 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: TMW-3 @ 5-10 Chain of Custody: 113541

Client Project Name: SCCBRA(16) Sample No: 13 Collect Date: 06/19/14

Client Project No: 140273 Sample Matrix: Ground Water Collect Time: 08:30

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | A | liquot ID: 62 | 2801-013 | Matrix: G | round Water | | |
|--|--------|---------|-----------------|---------------|----------|-----------|-------------|----------|------|
| | | | | | Prepa | ration | Δ | nalysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init |
| 1. Acetone | U | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 2. Acrylonitrile | U | μg/L | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPl |
| 3. Benzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 4. Bromobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 5. Bromochloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 6. Bromodichloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 7. Bromoform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 8. Bromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 9. 2-Butanone | U | μg/L | 25 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 10. n-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 11. sec-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 12. tert-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 13. Carbon Disulfide | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 14. Carbon Tetrachloride | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 15. Chlorobenzene | 1.1 | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 16. Chloroethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 17. Chloroform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 18. Chloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 19. 2-Chlorotoluene | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 20. Dibromochloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 21. 1,2-Dibromo-3-chloropropane (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 22. Dibromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JF |
| 23. 1,2-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 24. 1,3-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 25. 1,4-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 27. Dichlorodifluoromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 28. 1,1-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 29. 1,2-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 30. 1,1-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 31. cis-1,2-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 32 trans-1,2-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 33. 1,2-Dichloropropane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 34. cis-1,3-Dichloropropene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 35. trans-1,3-Dichloropropene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 36. Diethyl Ether | U | μg/L | 10 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 37. Ethylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 38. Ethylene Dibromide | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |

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Order: 62801 36 of 49 Page: Date: 06/26/14

Envirologic Technologies, Inc. Client Identification:

TMW-3 @ 5-10 Sample Description:

Chain of Custody:

113541

Client Project Name: SCCBRA(16)

Sample No: 13 Collect Date:

06/19/14

Client Project No:

140273 Sample Matrix:

Collect Time: **Ground Water**

08:30

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | | A | liquot ID: 62 | 2801-013 | Matrix: G | round Water | | |
|--|--------|---|-------|-----------------|---------------|----------|-----------|-------------|----------|-------|
| | | | | | | Prepa | ration | A | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| ‡ 39. Hexachloroethane | U | | μg/L | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 40. 2-Hexanone | U | | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 41. Isopropylbenzene | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 42. Methylene Chloride | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 43.2-Methylnaphthalene | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 44. 4-Methyl-2-pentanone | U | | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 45. MTBE | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 46. Naphthalene | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 47. n-Propylbenzene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 48. Styrene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 49. 1,1,1,2-Tetrachloroethane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 50. 1,1,2,2-Tetrachloroethane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 51. Tetrachloroethene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 52 Toluene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 53. 1,2,4-Trichlorobenzene | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 54. 1,1,1-Trichloroethane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 55. 1,1,2-Trichloroethane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 56. Trichloroethene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 57. Trichlorofluoromethane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 58. 1,2,3-Trichloropropane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 59.1,2,3-Trimethylbenzene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 60. 1,2,4-Trimethylbenzene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 61. 1,3,5-Trimethylbenzene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 62. Vinyl Chloride | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 63. Xylenes | U | | μg/L | 3.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| | | | | | | | | | | |



Order: 62801 Page: 37 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: TMW-2 @ 4-9 Chain of Custody: 113541

Client Project Name: SCCBRA(16) Sample No: 14 Collect Date: 06/19/14

Client Project No: 140273 Sample Matrix: Ground Water Collect Time: 09:00

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | Α | liquot ID: 6 | 2801-014 | Matrix: G | round Water | | |
|--|--------|---------|-----------------|--------------|----------|-----------|-------------|----------|-------|
| | | | | | Prepa | ration | Α | nalysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| 1. Acetone | U | μg/L | 50 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 2. Acrylonitrile | U | μg/L | 2.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPl |
| 3. Benzene | 3.2 | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPl |
| 4. Bromobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 5. Bromochloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 6. Bromodichloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 7. Bromoform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 8. Bromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 9. 2-Butanone | U | μg/L | 25 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 10. n-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPl |
| 11. sec-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 12. tert-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 13. Carbon Disulfide | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 14. Carbon Tetrachloride | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 15. Chlorobenzene | 68 | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 16. Chloroethane | U | μg/L | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 17. Chloroform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 18. Chloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 19. 2-Chlorotoluene | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 20. Dibromochloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 21. 1,2-Dibromo-3-chloropropane (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 22. Dibromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 23. 1,2-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 24. 1,3-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 25. 1,4-Dichlorobenzene | 8.8 | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 27. Dichlorodifluoromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 28. 1,1-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 29. 1,2-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 30. 1,1-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 31. cis-1,2-Dichloroethene | U | μg/L | | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 32 trans-1,2-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 33. 1,2-Dichloropropane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 34. cis-1,3-Dichloropropene | U | μg/L | | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 35. trans-1,3-Dichloropropene | U | μg/L | | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 36. Diethyl Ether | U | μg/L | 10 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 37. Ethylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 38. Ethylene Dibromide | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |

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Order: 62801 38 of 49 Page: Date: 06/26/14

Envirologic Technologies, Inc. Client Identification:

Sample Description: TMW-2 @ 4-9

Chain of Custody:

113541

Client Project Name: SCCBRA(16)

Sample No: 14 Collect Date:

06/19/14

Client Project No: 140273

Sample Matrix:

Ground Water

Collect Time: 09:00

Sample Comments:

Definitions:

Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | | Aliquot ID: | 62801-014 | Matrix: G | round Water | | |
|--|--------|--------|-------------------|-------------|-----------|-----------|-------------|----------|-------|
| | | | | | Prep | aration | Α | nalysis | |
| Parameter(s) | Result | Q Unit | s Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| ‡ 39. Hexachloroethane | U | μg/l | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 40. 2-Hexanone | U | μg/l | . 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 41. Isopropylbenzene | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 42. Methylene Chloride | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 43. 2-Methylnaphthalene | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 44. 4-Methyl-2-pentanone | U | μg/l | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 45. MTBE | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 46. Naphthalene | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 47. n-Propylbenzene | U | μg/l | _ 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 48. Styrene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 49. 1,1,1,2-Tetrachloroethane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 50. 1,1,2,2-Tetrachloroethane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 51. Tetrachloroethene | U | μg/l | _ 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 52. Toluene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 53. 1,2,4-Trichlorobenzene | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 54.1,1,1-Trichloroethane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 55. 1,1,2-Trichloroethane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 56. Trichloroethene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 57. Trichlorofluoromethane | U | μg/l | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 58. 1,2,3-Trichloropropane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 59. 1,2,3-Trimethylbenzene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 60. 1,2,4-Trimethylbenzene | U | μg/l | _ 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 61. 1,3,5-Trimethylbenzene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 62. Vinyl Chloride | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 63. Xylenes | U | μg/l | 3.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |



Order: 62801 Page: 39 of 49 Date: 06/26/14

09:00

Client Identification: Envirologic Technologies, Inc. Sample Description: TMW-2 @ 4-9 MS

Chain of Custody: 113541

Client Project Name: SCCBRA(16) Sample No: 15

Collect Date: **06/19/14**

Client Project No: 140273 Sample Matrix: Ground Water Collect Time:

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | | Al | iquot ID: 62 | 2801-015 | Matrix: G | round Water | | |
|--|--------|------|-------|-----------------|--------------|----------|-----------|-------------|----------|-------|
| | | | | | | Prepa | ration | Д | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 1. Acetone | 73 | J,V+ | μg/L | 50 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 2. Acrylonitrile | 100 | | μg/L | 2.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 3. Benzene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 4. Bromobenzene | 92 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 5. Bromochloromethane | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 6. Bromodichloromethane | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 7. Bromoform | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 8. Bromomethane | 91 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 9. 2-Butanone | 74 | | μg/L | 25 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPI |
| 10. n-Butylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 11. sec-Butylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 12. tert-Butylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 13. Carbon Disulfide | 130 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 14. Carbon Tetrachloride | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 15. Chlorobenzene | 170 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 16. Chloroethane | 140 | | μg/L | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JP |
| 17. Chloroform | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 18. Chloromethane | 120 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 19. 2-Chlorotoluene | 97 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 20. Dibromochloromethane | 110 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 21. 1,2-Dibromo-3-chloropropane (SIM) | 98 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 22. Dibromomethane | 110 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 23. 1,2-Dichlorobenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 24. 1,3-Dichlorobenzene | 97 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 25. 1,4-Dichlorobenzene | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 26. trans-1,4-Dichloro-2-butene (SIM) | 89 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 27. Dichlorodifluoromethane | 130 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 28. 1,1-Dichloroethane | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 29. 1,2-Dichloroethane | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 30. 1,1-Dichloroethene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 31. cis-1,2-Dichloroethene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 32 trans-1,2-Dichloroethene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 33. 1,2-Dichloropropane | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 34. cis-1,3-Dichloropropene | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 35. trans-1,3-Dichloropropene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 36. Diethyl Ether | 120 | | μg/L | 10 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 37. Ethylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 38. Ethylene Dibromide | 99 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |

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Order: 62801 Page: 40 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: TMW-2 @ 4-9 MS Chain of Custody: 113541

Client Project Name: SCCBRA(16) Sample No: 15 Collect Date: 06/19/14

Client Project No: 140273 Sample Matrix: Ground Water Collect Time: 09:00

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | | A | iquot ID: 62 | 801-015 | Matrix: G | round Water | | |
|--|--------|---|-------|-----------------|--------------|----------|-----------|-------------|----------|-------|
| | | | | | | Prepa | ration | A | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| ‡ 39. Hexachloroethane | 98 | | μg/L | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 40. 2-Hexanone | 82 | | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 41. Isopropylbenzene | 110 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 42. Methylene Chloride | 120 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 43.2-Methylnaphthalene | 110 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 44. 4-Methyl-2-pentanone | 120 | | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 45. MTBE | 120 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 46. Naphthalene | 100 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 47. n-Propylbenzene | 97 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 48. Styrene | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 49. 1,1,1,2-Tetrachloroethane | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 50. 1,1,2,2-Tetrachloroethane | 95 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 51. Tetrachloroethene | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 52. Toluene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 53. 1,2,4-Trichlorobenzene | 110 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 54. 1,1,1-Trichloroethane | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 55. 1,1,2-Trichloroethane | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 56. Trichloroethene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 57. Trichlorofluoromethane | 120 | | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 58.1,2,3-Trichloropropane | 93 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 59.1,2,3-Trimethylbenzene | 99 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 60. 1,2,4-Trimethylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 61. 1,3,5-Trimethylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 62. Vinyl Chloride | 130 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 63. Xylenes | 300 | | μg/L | 3.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |

RSN: 62801-140626153334



Order: 62801 Page: 41 of 49 Date: 06/26/14

113541

Client Identification: Envirologic Technologies, Inc. Sample Description: TMW-2 @ 4-9 MSD Chain of Custody:

Client Project Name: SCCBRA(16) Sample No: 16 Collect Date: 06/19/14

Client Project No: 140273 Sample Matrix: Ground Water Collect Time: 09:00

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | | Al | iquot ID: 62 | 801-016 | Matrix: G | round Water | | |
|--|--------|------|-------|-----------------|--------------|----------|-----------|-------------|----------|-------|
| | | | | | | Prepa | | | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| 1. Acetone | 67 | J,V+ | μg/L | 50 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| ‡ 2. Acrylonitrile | 100 | | μg/L | 2.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 3. Benzene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 4. Bromobenzene | 95 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 5. Bromochloromethane | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 6. Bromodichloromethane | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 7. Bromoform | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 8. Bromomethane | 96 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 9. 2-Butanone | 71 | | μg/L | 25 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 10. n-Butylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 11. sec-Butylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 12. tert-Butylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 13. Carbon Disulfide | 120 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 14. Carbon Tetrachloride | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 15. Chlorobenzene | 180 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 16. Chloroethane | 140 | | μg/L | 5.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 17. Chloroform | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 18. Chloromethane | 120 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 19. 2-Chlorotoluene | 98 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 20. Dibromochloromethane | 110 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 21.1,2-Dibromo-3-chloropropane (SIM) | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 22. Dibromomethane | 120 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 23. 1,2-Dichlorobenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 24. 1,3-Dichlorobenzene | 99 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 25. 1,4-Dichlorobenzene | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 26. trans-1,4-Dichloro-2-butene (SIM) | 93 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 27. Dichlorodifluoromethane | 130 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 28. 1,1-Dichloroethane | 130 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 29. 1,2-Dichloroethane | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 30. 1,1-Dichloroethene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 31. cis-1,2-Dichloroethene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 32. trans-1,2-Dichloroethene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 33.1,2-Dichloropropane | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 34. cis-1,3-Dichloropropene | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 35. trans-1,3-Dichloropropene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 36. Diethyl Ether | 120 | | μg/L | 10 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 37. Ethylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 38. Ethylene Dibromide | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |

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Order: 62801 42 of 49 Page: Date: 06/26/14

Envirologic Technologies, Inc. Client Identification:

TMW-2 @ 4-9 MSD Sample Description:

Chain of Custody:

113541

Client Project Name: SCCBRA(16)

Sample No: 16 Collect Date:

06/19/14

Client Project No: 140273 Sample Matrix:

Ground Water

Collect Time:

09:00

Sample Comments:

Definitions:

Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | | Α | liquot ID: 62 | 2801-016 | Matrix: G | round Water | | |
|--|--------|---|-------|-----------------|---------------|----------|-----------|-------------|----------|-------|
| | | | | | | Prepa | ration | Α | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| ‡ 39. Hexachloroethane | 100 | | μg/L | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 40. 2-Hexanone | 91 | | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 41. Isopropylbenzene | 110 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 42. Methylene Chloride | 120 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 43. 2-Methylnaphthalene | 110 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 44. 4-Methyl-2-pentanone | 130 | | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 45. MTBE | 120 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 46. Naphthalene | 100 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 47. n-Propylbenzene | 99 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 48. Styrene | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 49. 1,1,1,2-Tetrachloroethane | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 50. 1,1,2,2-Tetrachloroethane | 99 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 51. Tetrachloroethene | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 52. Toluene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 53. 1,2,4-Trichlorobenzene | 110 | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 54. 1,1,1-Trichloroethane | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 55. 1,1,2-Trichloroethane | 110 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 56. Trichloroethene | 120 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 57. Trichlorofluoromethane | 120 | | μg/L | 1.0 | 1.0 | 06/23/14 | VB14F23C | 06/23/14 | VB14F23C | JPL |
| 58. 1,2,3-Trichloropropane | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 59.1,2,3-Trimethylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 60. 1,2,4-Trimethylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 61. 1,3,5-Trimethylbenzene | 100 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 62. Vinyl Chloride | 130 | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 63. Xylenes | 310 | | μg/L | 3.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| | | | | | | | | | | |

DCSID: G-610.15 (10/09/13)



Order: 62801 Page: 43 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: TMW-1 @ 4-9 Chain of Custody: 113541

Client Project Name: SCCBRA(16) Sample No: 17 Collect Date: 06/19/14

Client Project No: 140273 Sample Matrix: Ground Water Collect Time: 09:35

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | A | liquot ID: 62 | 2801-017 | Matrix: G | round Water | | |
|--|--------|---------|-----------------|---------------|----------|-----------|-------------|----------|------|
| | | | | | Prepa | ration | Д | nalysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init |
| 1. Acetone | U | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 2. Acrylonitrile | U | μg/L | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 3. Benzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 4. Bromobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 5. Bromochloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 6. Bromodichloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 7. Bromoform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 8. Bromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 9. 2-Butanone | U | μg/L | 25 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 10. n-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 11. sec-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 12. tert-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 13. Carbon Disulfide | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 14. Carbon Tetrachloride | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 15. Chlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 16. Chloroethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 17. Chloroform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 18. Chloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 19. 2-Chlorotoluene | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 20. Dibromochloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 21. 1,2-Dibromo-3-chloropropane (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 22. Dibromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 23. 1,2-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 24. 1,3-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 25. 1,4-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 27. Dichlorodifluoromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 28. 1,1-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 29. 1,2-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 30. 1,1-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 31. cis-1,2-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 32 trans-1,2-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JP |
| 33. 1,2-Dichloropropane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 34. cis-1,3-Dichloropropene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 35. trans-1,3-Dichloropropene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 36. Diethyl Ether | U | μg/L | 10 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 37. Ethylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 38. Ethylene Dibromide | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |

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Order: 62801 Page: 44 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: TMW-1 @ 4-9 Chain of Custody: 113541

Client Project Name: SCCBRA(16) Sample No: 17 Collect Date: 06/19/14

Client Project No: 140273 Sample Matrix: Ground Water Collect Time: 09:35

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | | Aliquot ID: | 62801-017 | Matrix: G | Fround Water | | |
|--|--------|--------|-------------------|-------------|-----------|-----------|--------------|----------|-------|
| | | | | | Prep | aration | A | Analysis | |
| Parameter(s) | Result | Q Unit | s Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| ‡ 39. Hexachloroethane | U | μg/l | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 40. 2-Hexanone | U | μg/l | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 41. Isopropylbenzene | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 42. Methylene Chloride | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 43.2-Methylnaphthalene | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 44. 4-Methyl-2-pentanone | U | μg/l | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 45. MTBE | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 46. Naphthalene | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 47. n-Propylbenzene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 48. Styrene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 49. 1,1,1,2-Tetrachloroethane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 50. 1,1,2,2-Tetrachloroethane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 51. Tetrachloroethene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 52. Toluene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 53. 1,2,4-Trichlorobenzene | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 54.1,1,1-Trichloroethane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 55. 1,1,2-Trichloroethane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 56. Trichloroethene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 57. Trichlorofluoromethane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 58. 1,2,3-Trichloropropane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 59.1,2,3-Trimethylbenzene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 60. 1,2,4-Trimethylbenzene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 61. 1,3,5-Trimethylbenzene | U | μg/l | _ 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 62. Vinyl Chloride | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 63. Xylenes | U | μg/l | 3.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |



Order: 62801 Page: 45 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc.

140273

Sample Description: M-1GW

Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Chain of Custody:

113541

Client Project Name: SCCBRA(16)

Sample No:

Sample Matrix:

18

Ground Water

Collect Date:

Collect Time:

06/19/14

NA

Client Project No:

Sample Comments:

Definitions:

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | A | iquot ID: 6 | 2801-018 | Matrix: G | round Water | | |
|--|--------|---------|-----------------|-------------|----------|-----------|-------------|----------|-------|
| | | | | | Prepa | ration | Δ | Analysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| 1. Acetone | U | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 2. Acrylonitrile | U | μg/L | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 3. Benzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 4. Bromobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 5. Bromochloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 6. Bromodichloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 7. Bromoform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 8. Bromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 9. 2-Butanone | U | μg/L | 25 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 10. n-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 11. sec-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 12. tert-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 13. Carbon Disulfide | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 14. Carbon Tetrachloride | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 15. Chlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 16. Chloroethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 17. Chloroform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 18. Chloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 19. 2-Chlorotoluene | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 20. Dibromochloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 21. 1,2-Dibromo-3-chloropropane (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 22. Dibromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 23. 1,2-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 24. 1,3-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 25. 1,4-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 27. Dichlorodifluoromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 28. 1,1-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 29. 1,2-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPI |
| 30. 1,1-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 31. cis-1,2-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 32 trans-1,2-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 33. 1,2-Dichloropropane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 34. cis-1,3-Dichloropropene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 35 trans-1,3-Dichloropropene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 36 Diethyl Ether | U | μg/L | 10 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 37. Ethylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| | U | | 1.0 | 1.0 | 06/20/14 | | | | |

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Order: 62801 Page: 46 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: M-1GW Chain of Custody: 113541

Client Project Name: SCCBRA(16) Sample No: 18 Collect Date: 06/19/14

Client Project No: 140273 Sample Matrix: Ground Water Collect Time: NA

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | | A | liquot ID: 62 | 2801-018 | Matrix: Ground Water | | | |
|--|--------|---|-------|-----------------|---------------|----------|----------------------|----------|----------|-------|
| | | | | | | Prepa | ration | Aı | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| ‡ 39. Hexachloroethane | U | | μg/L | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 40. 2-Hexanone | U | | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 41. Isopropylbenzene | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 42. Methylene Chloride | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 43.2-Methylnaphthalene | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 44. 4-Methyl-2-pentanone | U | | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 45. MTBE | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 46. Naphthalene | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 47. n-Propylbenzene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 48. Styrene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 49. 1,1,1,2-Tetrachloroethane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 50. 1,1,2,2-Tetrachloroethane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 51. Tetrachloroethene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 52 Toluene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 53. 1,2,4-Trichlorobenzene | U | | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 54. 1,1,1-Trichloroethane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 55. 1,1,2-Trichloroethane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 56. Trichloroethene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 57. Trichlorofluoromethane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 58. 1,2,3-Trichloropropane | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 59.1,2,3-Trimethylbenzene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 60. 1,2,4-Trimethylbenzene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 61. 1,3,5-Trimethylbenzene | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 62 Vinyl Chloride | U | | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 63. Xylenes | U | | μg/L | 3.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |

RSN: 62801-140626153334



Order: 62801 Page: 47 of 49 Date: 06/26/14

Client Identification: Envirologic Technologies, Inc. Sample Description: EB-1GW Chain of Custody: 113541

Client Project Name: SCCBRA(16) Sample No: 19 Collect Date: 06/19/14

Client Project No: 140273 Sample Matrix: Ground Water Collect Time: 09:45

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | A | liquot ID: 62 | 2801-019 | 019 Matrix: Ground Water | | | | |
|--|--------|---------|-----------------|----------|--------------------------|----------|----------|----------|-------|
| | | | | | Prepa | | | nalysis | |
| Parameter(s) | Result | Q Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | lnit. |
| 1. Acetone | U | μg/L | 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 2. Acrylonitrile | U | μg/L | 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 3. Benzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 4. Bromobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 5. Bromochloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 6. Bromodichloromethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 7. Bromoform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 8. Bromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 9. 2-Butanone | U | μg/L | 25 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 10. n-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 11. sec-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 12. tert-Butylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 13. Carbon Disulfide | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 14. Carbon Tetrachloride | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 15. Chlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 16. Chloroethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 17. Chloroform | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 18. Chloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 19. 2-Chlorotoluene | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 20. Dibromochloromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 21.1,2-Dibromo-3-chloropropane (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 22. Dibromomethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 23. 1,2-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 24. 1,3-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 25. 1,4-Dichlorobenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 26. trans-1,4-Dichloro-2-butene (SIM) | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 27. Dichlorodifluoromethane | U | μg/L | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 28. 1,1-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 29. 1,2-Dichloroethane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 30. 1,1-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 31. cis-1,2-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 32. trans-1,2-Dichloroethene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 33. 1,2-Dichloropropane | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 34. cis-1,3-Dichloropropene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 35. trans-1,3-Dichloropropene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 36. Diethyl Ether | U | μg/L | 10 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 37. Ethylbenzene | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |
| 38. Ethylene Dibromide | U | μg/L | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | |

1914 Holloway Drive 11766 E. Grand River 8660 S. Mackinaw Trail Holt, MI 48842 Brighton, MI 48116 Cadillac, MI 49601 T: (517) 699-0345 T: (810) 220-3300 T: (231) 775-8368



Order: 62801 48 of 49 Page: Date: 06/26/14

09:45

Envirologic Technologies, Inc. Chain of Custody: Client Identification: Sample Description: EB-1GW

113541

Client Project Name: SCCBRA(16) 06/19/14 Sample No: 19 Collect Date:

Client Project No: 140273 Sample Matrix: Collect Time: **Ground Water**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Plus List (VOCs) (EPA 5030B/EPA 8260B) | | | | Aliquot ID: | 62801-019 | Matrix: G | round Water | | |
|--|--------|--------|-------------------|-------------|-----------|-----------|-------------|----------|-------|
| | | | | | Prepa | aration | Δ | nalysis | |
| Parameter(s) | Result | Q Unit | s Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| ‡ 39. Hexachloroethane | U | μg/l | . 2.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 40. 2-Hexanone | U | μg/l | . 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 41. Isopropylbenzene | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 42. Methylene Chloride | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 43.2-Methylnaphthalene | U | μg/l | . 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 44. 4-Methyl-2-pentanone | U | μg/l | . 50 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 45. MTBE | U | μg/l | . 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 46. Naphthalene | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 47. n-Propylbenzene | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 48. Styrene | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 49. 1,1,1,2-Tetrachloroethane | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 50. 1,1,2,2-Tetrachloroethane | U | μg/l | 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 51. Tetrachloroethene | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 52. Toluene | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 53. 1,2,4-Trichlorobenzene | U | μg/l | 5.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 54.1,1,1-Trichloroethane | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 55. 1,1,2-Trichloroethane | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 56. Trichloroethene | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 57. Trichlorofluoromethane | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 58. 1,2,3-Trichloropropane | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| ‡ 59.1,2,3-Trimethylbenzene | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 60. 1,2,4-Trimethylbenzene | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 61. 1,3,5-Trimethylbenzene | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 62. Vinyl Chloride | U | μg/l | . 1.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |
| 63. Xylenes | U | μg/l | . 3.0 | 1.0 | 06/20/14 | VB14F20B | 06/21/14 | VB14F20B | JPL |

RSN: 62801-140626153334



Analytical Laboratory Report Laboratory Project Number: 62801

Order: 62801 Page: 49 of 49 Date: 06/26/14

Definitions/ Qualifiers:

- A: Spike recovery or precision unusable due to dilution.
- B: The analyte was detected in the associated method blank.
- E: The analyte was detected at a concentration greater than the calibration range, therefore the result is estimated.
- J: The concentration is an estimated value.
- M: Modified Method
- **U:** The analyte was not detected at or above the reporting limit.
- X: Matrix Interference has resulted in a raised reporting limit or distorted result.
- W: Results reported on a wet-weight basis.
- *: Value reported is outside QA limits

Exception Summary:

N1 : Spiked sample recovery not within control limits.

V+ : Recovery in the associated continuing calibration verification sample (CCV) exceeds the upper control limit. Results may be biased high.



E-10395 (KS)

T104704518-13-1 (TX)

DCSID: G-610.15 (10/09/13)



Analytical Laboratory

1914 Holloway Drive Holf, MI 48842

Phone: 517 699 0345

Fax: 517 699 0388 emall: lab@fibertec.us 8660 S. Mackinaw Trail

Cadillac, MI 49601 Phone: 231 775 8368

Fax: 231 775 8584

Industrial Hygiene Services, inc.

1914 Holloway Drive Holf, MI 48842

Phone: 517 699 0345 Fax: 517 699 0382

email: asbestos@fibertec.us

Geoprobe

11766 E. Grand River Brighton, Mi 48116

Phone: 810 220 3300 Fax: 810 220 3311

Chain of Custody #

113540 PAGE __ of _3

| Client 1 | Name: | E | nvirolon | ic Te | chnologres | | | | | | | PARA | METERS | | | Turnaround | Matrix Code |
|--------------------|------------------------------------|---------|-----------|-------------------|--------------------------|------------------------------------|-----------------|-----------------|------|-----|---------|---------|-------------|------|-----|---|--|
| Contac | ct Perso | | Daves | Hegink | |] _ | | | | | TE | | | | | 24 hour RUSH (surcharge applies) | \$ Soil GW Ground Water |
| Project | Name S | e/ Numb | | | | MATRIX (SEE RIGHT CORNER FOR CODE) | # OF CONTAINERS | PRESERVED (Y/N) | olux | | metals | | | | | 48 hour RUSH (surcharge applies) 72 hour RUSH (surcharge applies) Standard (5-7 bus. days) Other: Specify | W water SW Surface Water A Air WW Waste Water O Oil X Other: Specify P Wipe |
| | se Ord | ler# | | | | | S | ₹ KE | 1 % | 1 | 9 | | | | 1 1 | | |
| Lab Sample # | Do | ate | | Client ample # | Client Sample Descriptor | MATRI | # OF (| PRESE | 028 | PWA | MI | | | | | Remarks: | |
| | _ | | | | trip blank | W | 1 | У | + | | | | | | | | |
| | , , | _ | | | methanol blank | S | 1 | Y | + | | | _ | | | | | |
| | 6/18 | 144 | 1200P | | 65B-6 e2' | 5 | 2 | У | + | + | + | | | | | | |
| | | | 12:20P | | 658-5e2 Ms/msD | 5 | 6 | Y | + | + | + | | | | | | |
| | | | 1:10 6 | | 65B-1e2' | 2 | 2 | Y | + | + | + | 1 | | | | | |
| | | | 1:250 | | 65B-2e2' | S | 2 | ·y | 1+ | + | + | | | | | | |
| | | | INOP | | 65B-3 = 2' | 2 | 2 | Y | + | + | + | | | | | | |
| | | | 1:55 P | | 658-4e2' | 5 | 2 | y | 1+ | + | + | | | | | | |
| | | | 3.05P | | EB-1005 | W | 3 | У | + | | | | | | | | |
| | 1 4 | | | | M-15 | S | 2 | y | 1+ | + | + | | | | | | |
| Comm | ents: | | | | | | | | | , i | | | | | | | |
| Reling | uished | By: | elts | | | Do | /19 | Tim // | e 14 | :28 | Receive | d B | 4 | Run | | | |
| Relinq | uished | Ву: | | | | Do | ate/ | Tim | ne | | Receive | d By: | | | | | |
| Relinq | uished | Ву: | | | | Do | ate/ | Tim | ne | | Receive | ed By L | aborat | ory: | | | |
| Fiberte Labore | E ONLY ec projectory Trestature | | mber: 6.0 | ρC | | | Y | - | 28 | 7 4 | | | | | | | V'D ON |
| | | | | | TERMS & CO | DNE | ITIC | 10 | NS C | INC | BACK | | | | | | |



Analytical Laboratory

1914 Holloway Drive Holf, MI 48842 Phone: 517 699 0345 Fax: 517 699 0388

email: lab@fibertec.us

8660 S. Mackinaw Trail Cadillac, Mi 49601 Phone: 231 775 8368 Fax: 231 775 8584 Industrial Hygiene Services, Inc. 1914 Holloway Drive

Holf, MI 48842 Phone: 517 699 0345 Fax: 517 699 0382

emall: asbestos@flbertec.us

Geoprobe

11766 E. Grand River Brighton, MI 48116

Phone: 810 220 3300 Fax: 810 220 3311 Chain of Custody #

113541 PAGE 2 of 3

| Client Na | me: E | wirola | esrc T | echnologies | | | T | | | PARAMETERS | | | trix Code |
|--|--|------------------------|--------------------|--------------------------|-------|-----------------|-----------------|-------------|------|-------------------------|------|--|---|
| Contact Project N | ame/Numl | Dave ber: BRA/ | | echnologies mk 73 | | # OF CONTAINERS | (N/X) | | 3014 | | | 24 hour RUSH (surcharge applies) 48 hour RUSH (surcharge applies) 72 hour RUSH (surcharge applies) 43 A A A A A A A A A A A A A A A A A A A | water SW Surface Water SW Surface Water WW Waste Water Dil X Other: Specify |
| Purchase | Order# | | | | - 0 | IN C | | | 3 | | | Lawrence and Lawrence | |
| Lab Sample # | Date | Time | Client Sample # | Client Sample Descriptor | MATRI | # OF O | PRESERVED (Y/N) | 0 | 2960 | | | Remarks: | |
| 6 | /19/14 | 8:30A | | TMW-3e5-10' | h | 13 | y | | - | | | | |
| | | 9:00A | | TMW-204-9' MS/150 | K | 9 | V | 1+ | , | | | | |
| | 1 | 9:35A | | · TMW-1e4-9. | | | | 1+ | | | | | |
| | | | | M-16W | 1 | 13 | Y | + | | | | | |
| | 1 | 9454 | | EB-16W | 1/~ | 13 | 3 7 | 1+ | _ | | | | |
| | | | | | | | + | | L | | | | |
| | | | | | + | | | | - | | | | |
| Commer | nts: | | | | | | | | | ^ | 10-1 | | |
| Relinquist | ut u | Lebot | _ |). | 6 | de /19 | /In | ne / { \ | ::28 | Redeived By: Am | | | |
| Relinquist | hed By: | | | | D | ate, | / Tim | ne | | Received By: | | | |
| Relinquisl | hed By: | | | | D | ate, | / Tim | ne | | Received By Laboratory: | | | |
| LAB USE (Fiberlec Laborato Tempera | ONLY: project num pry Tracking iture at Rec | nber: : :eipt:6/ | 90(| | | | | | | | | RC\ | /'D ON |



Wednesday, July 09, 2014

Fibertec Project Number: 62801 Supplemental
Project Identification: SCCBRA(16) /140273

Submittal Date: 06/19/2014

Mr. David Stegink Envirologic Technologies, Inc. 2960 Interstate Parkway Kalamazoo, MI 49048

Dear Mr. Stegink,

Thank you for selecting Fibertec Environmental Services as your analytical laboratory. The samples you submitted have been analyzed in accordance with NELAC standards and the results compiled in the attached report. Any exceptions to NELAC compliance are noted in the report. These results apply only to those samples submitted. Please note TO-15 samples will be disposed of 14 days after the reporting date. All other samples will be disposed of 30 days after the reporting date.

If you have any questions regarding these results or if we may be of further assistance to you, please contact me at (517) 699-0345.

Sincerely,

Daryl P. Strandbergh Laboratory Director

DPS/kc

Enclosures



Order: 62801 Page: 2 of 3 Date: 07/09/14

Envirologic Technologies, Inc. GSB-2 @ 2 Chain of Custody: 113540 Client Identification: Sample Description:

Client Project Name: SCCBRA(16) 06/18/14 Sample No: 8 Collect Date:

Client Project No: 140273 Sample Matrix: Soil/Solid Collect Time: 13:25

Sample Comments: Soil results have been calculated and reported on a dry weight basis unless otherwise noted.

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

| Lead, MDEQ Criteria (EPA 0200.2-M/EP | A 6020A) | | | Aliquot ID: 62801-008B Matrix: Soil/Solid | | | | | | |
|--------------------------------------|----------|---|-------|---|----------|----------|----------|----------|----------|-------|
| | | | | | | Prepa | ration | А | nalysis | |
| Parameter(s) | Result | Q | Units | Reporting Limit | Dilution | P. Date | P. Batch | A. Date | A. Batch | Init. |
| 1. Lead, Coarse Fraction | 560000 | | μg/kg | 1000 | 100 | 07/09/14 | PT14G09C | 07/09/14 | T214G09A | JLP |
| 2 Lead, Fine Fraction | 671000 | | μg/kg | 1000 | 200 | 07/09/14 | PT14G09C | 07/09/14 | T214G09A | JLP |
| 3. Lead, Total (Calculated) | 615000 | | μg/kg | 1000 | 1.0 | 07/09/14 | PT14G09C | 07/09/14 | T214G09A | JLP |
| 4. Percent Total Solids | 86.3 | | % | 0.1 | 1.0 | 07/09/14 | PT14G09C | 07/09/14 | T214G09A | JLP |



Analytical Laboratory Report Laboratory Project Number: 62801

Order: 62801 Page: 3 of 3 Date: 07/09/14

Definitions/ Qualifiers:

- A: Spike recovery or precision unusable due to dilution.
- **B:** The analyte was detected in the associated method blank.
- E: The analyte was detected at a concentration greater than the calibration range, therefore the result is estimated.
- J: The concentration is an estimated value.
- M: Modified Method
- U: The analyte was not detected at or above the reporting limit.
- X: Matrix Interference has resulted in a raised reporting limit or distorted result.
- W: Results reported on a wet-weight basis.
- *: Value reported is outside QA limits

Exception Summary:



E-10395 (KS)

T104704518-13-1 (TX)

RSN: 62801-140709170454

APPENDIX D

RDD OPERATIONAL MEMORANDUM NO. 5 GSI AND GSI PROTECTION CRITERIA CALCULATION SPREADSHEET

Calculation of Generic Facility-Specific Part 201 Groundwater Surface Water Interface (GSI) Criteria for {G} Footnoted Hazardous Substances

Directions for calculating generic facility-specific GSI criteria:

- 1. Enter "hardness" (Column C) or "pH" (Column D). Click the green check mark to the left of the Excel formula bar or press the "Enter" key.
- 2. The GSI criteria for surface water not protected as a source of drinking water are the lower of the final chronic value (FCV), wildlife value (WV), and the surface water human non-drinking water value (HNDV). These criteria are presented in Column L.
- 3. The GSI criteria for surface water protected as a source of drinking water are the lower of the FCV, WV, and surface water human drinking water value (HDV). Surface water protected as a source of drinking water includes the Great Lakes and their connecting waters, and inland surface water in close proximity to a water supply intake. These criteria are presented in Column M. Refer to Part 201 Criteria Application Guidesheet #3 for further guidance on selecting the applicable GSI criterion.
- 4. The final acute values (FAV) protective of aquatic life are presented in column E. The calculation of the FAV is provided to allow the identification of any exceedance of an acute GSI criterion. Where an exceedance of an acute GSI criterion exists, an evaluation must be done to determine appropriate action in accordance with provisions of R 299.5716, R 299.5526(4) and RRD Operational Memorandum No. 5.

| | | | | С | alculate GS | l in ug/L (| ppb) | | | | | |
|------------------------|--|--------------------------------------|---------------|----------------------------|--------------------------|------------------------------|-----------------------------|------------------------|---|--|--|--|
| Hazardous Substance | Chemical Abstract Service Number (CAS #) | * ENTER Hardness in mg CaCO3/L | * ENTER pH | Final Acute Value (FAV) | FAV Conversion Factor | Final Chronic Value (FCV) | FCV Conversion Factor | Wildlife Value (WV) | Surface Water Human Non-Drinking Water Value (HNDV) | Surface Water Human Drinking Water Value (HDV) | GSI Criteria for Surface Water Not Protected for Drinking Water Use | GSI Criteria for Surface Water Protected for Drinking Water Use |
| Acetate | 71501 | NA | рН | Calculated | NA | Calculated | NA | NA | 1.3E+6 | 16,000 | Calculated | Calculated |
| Acetic acid | 64197 | NA | pН | Calculated | NA | Calculated | NA | NA | 1.3E+6 | 16,000 | Calculated | Calculated |
| Barium | 7440393 | 150 | NA | 3844.136403 | NA | 6.7E+2 | NA | NA | 1.6E+5 | 1,900 | 6.7E+2 | 6.7E+2 |
| Beryllium | 7440417 | hardness | NA | Calculated | NA | Calculated | NA | NA | 1,200 | 160 | Calculated | Calculated |
| Cadmium | 7440439 | 150 | NA | 13.23243782 | 0.927027019 | 3.0E+0 | 0.892027019 | NA | 130 | 3 | 3.0E+0 | 2.5E+0 |
| Chromium (III) | 16065831 | 150 | NA | 1588.339518 | NA | 1.0E+2 | 0.86 | NA | 9,400 | 120 | 1.0E+2 | 1.0E+2 |
| Copper | 7440508 | 150 | NA | 39.38345326 | NA | 1.3E+1 | 0.96 | NA | 38,000 | 470 | 1.3E+1 | 1.3E+1 |
| Lead | 7439921 | 150 | NA | 550.8500175 | 0.731930331 | 2.9E+1 | 0.731930331 | NA | 190 | 14 | 2.9E+1 | 1.4E+1 |
| Manganese | 7439965 | hardness | NA | Calculated | NA | Calculated | NA | NA | 59,000 | 1,300 | Calculated | Calculated |
| Nickel | 7440020 | hardness | NA | Calculated | NA | Calculated | 0.997 | NA | 2.1E+5 | 2,600 | Calculated | Calculated |
| Zinc | 7440666 | 150 | NA | 330.4359543 | NA | 1.7E+2 | 0.986 | NA | 16,000 | 3,300 | 1.7E+2 | 1.7E+2 |
| Pentachlorophenol | 87865 | NA | рН | Calculated | NA | Calculated | NA | NA | 2.8 | 1.8 | Calculated | Calculated |

NA = Criterion or value is not available or not applicable.

^{*} The formulas in this spreadsheet depend upon appropriate entries in these cells. Do not leave these cells blank. If numeric hardness or pH values are not available, enter the word "hardness" or "pH" in the appropriate cell.

Calculation of Generic Facility-Specific Part 201 Soil GSI Protection Criteria (GSI PC) for {G} Footnoted Hazardous Substances □

Directions for calculating a generic facility-specific soil GSI PC:

- Manually type in the "GSI" criterion calculated on the previous page, rounded to 2 significant figures. DO NOT CUT
 AND PASTE as this will enter the unrounded value and generate a different value. Click the green check mark to the left of
 the Excel formula bar or press the "Enter" key.
- 2. The GSI PC will calculate and appear in Column W. The GSI PC are the higher of the Soil-Water Partition Value for GSI (Column U) and the 20 X GSI value (Column V).

Calculate Soil GSI PC in ug/Kg (ppb)

| Hazardous Substance | Chemical Abstract Service Number (CAS #) | * ENTER GSI | Soil-Water Distribution Coefficients (Kd) L/Kg | Henry's Law Constant (HLC) atm-m3/mol | Soil Organic Carbon-Water Partition Coefficient (Koc) L/Kg | Soil-Water Partition Value for GSI ug/Kg | 20 X GSI ug/Kg | Soil GSI PC ug/Kg |
|------------------------|--|----------------|---|--|--|---|-------------------|----------------------|
| Acetate | 71501 | GSI | NA | NA | NA | Calculated | Calculated | Calculated |
| Acetic acid | 64197 | GSI | NA | NA | NA | Calculated | Calculated | Calculated |
| Barium | 7440393 | 6.7E+2 | 41 | NA | NA | 4.4E+5 | 1.3E+4 | 4.4E+5 |
| Beryllium | 7440417 | GSI | 790 | NA | NA | Calculated | Calculated | Calculated |
| Cadmium | 7440439 | 2.5E+0 | 75 | NA | NA | 3.0E+3 | 5.0E+1 | 3.0E+3 |
| Chromium (III) | 16065831 | 1.0E+2 | 1.8E+6 | NA | NA | 3.0E+9 | 2.1E+3 | 3.0E+9 |
| Copper | 7440508 | 1.3E+1 | 360 | NA | NA | 7.3E+4 | 2.5E+2 | 7.3E+4 |
| Lead | 7439921 | 1.4E+1 | 11,000 | NA | NA | 2.5E+6 | 2.8E+2 | 2.5E+6 |
| Manganese | 7439965 | GSI | NA | NA | NA | Calculated | Calculated | Calculated |
| Nickel | 7440020 | GSI | 65 | NA | NA | Calculated | Calculated | Calculated |
| Zinc | 7440666 | 1.7E+2 | 62 | NA | NA | 1.7E+5 | 3.3E+3 | 1.7E+5 |
| Pentachlorophenol | 87865 | GSI | NA | 2.44E-8 | 592 | Calculated | Calculated | Calculated |

NA = Criterion or value is not available or not applicable.

^{*} The formulas in this spreadsheet depend upon appropriate entries in these cells. Do not leave these cells blank. If numeric GSI values are not available, enter "GSI" in the appropriate cell.

APPENDIX E

DATA VALIDATION REPORT



DATA VALIDATION REPORT (QUALITY ASSURANCE ASSESSMENT) FOR PHASE II ENVIRONMENTAL SITE ASSESSMENT OF CHESTER LIMITED III, LLC

2654 20TH STREET PORT HURON, MICHIGAN

Envirologic completed a Phase II Environmental Site Assessment (ESA) of a property known as Chester Limited III, LLC, located at 2654 20th St., Port Huron, Michigan. The Phase II ESA was completed with support from the St. Clair County Brownfield Redevelopment Authority's USEPA Coalition Assessment Grant for Hazardous Substances Contaminated Sites (Cooperative Agreement BF-00E00406-0).

The purpose of this *Data Validation Report* is to validate and verify the analytical data as well as draw conclusions based on the data in relation to the Data Quality Objectives (DQOs) for potential contamination in groundwater as described in the *Sampling Plan*.

DQOS AND SAMPLE DESIGN REVIEW

On May 21, 2014, ASTI Environmental (ASTI) completed a Phase I ESA of the Chester Limited III, LCC property. The subject property is currently occupied by Writz, a manufacturer of battery manufacturing equipment. The majority of the site building was built in 1967 followed by two additions constructed in 1991 and 1994; the date of original construction raises the possibility that asbestos containing materials were used throughout the building.

The ASTI Phase I ESA indicated that the former occupants of the property include a stamping facility that used rolled steel and quenching oil as part of the manufacturing process in the late 1960s and early 1970s. Information relating to the storage, handling, and disposal practices related to the quenching oil is not known. Furthermore, records reviewed during the Phase I indicated that groundwater plumes emanating from the east and south adjacent properties may migrate onto the subject property. The presence of chlorinated volatile organic compounds in groundwater creates a potential vapor encroachment conditions (pVEC).

Envirologic designed a Phase II ESA in order to further investigate soil and groundwater conditions relative to former plant operations and offsite migration onto the subject property.

DATA QUALITY OBJECTIVES

Phase II activities were initiated in order to investigation the following DQOs set forth in the USEPA-approved Sampling and Analysis Plan:

- Has offsite groundwater contamination migrated onto the property, resulting in hazardous substance impact to the property and a potential for vapor encroachment?
- Has the outdoor storage of materials associated with former facility operations resulted in a hazardous substance impact to soil and groundwater?
- Are the areas of stained and cracked foundation concrete, including the northern portion of the original shop, the AC room, and near the compressor discharge area, associated with hazardous substance impact to soil and groundwater?
- Does the main building, originally constructed in 1967, have asbestos containingmaterials?

DATA REVIEW (DATA VERIFICATION AND VALIDATION)

The data collected in the investigation was reviewed by the Data Manager, with supporting review provided by David Stegink – Associate Vice President and Senior Environmental Scientist. The purpose of the review of to confirm (verify) that the data was collected in accordance with the Standard Operating Procedures (SOPs) and Quality Assurance Project Plan (QAPP). The purpose of the Data Verification and Validation was to determine the usefulness of the data in making decisions proposed by the DQOs and for making decisions on future property use with respect to environmental concerns. All of the collected data was determined to be verified and valid using the PARCC criteria (precision, accuracy, representativeness, completeness, and comparability) as explained in the following table:

| Criteria | Field Data | Laboratory Data |
|--------------------|---|--|
| Precision | Field methods and equipment calibration SOPs were followed in order to provide data with the precision limits of the field equipment | Results between the masked duplicate sample for soil (M-1S) are comparable to the corresponding sample result, GSB-6@2'. The matrix spike and matrix spike duplicate samples returned similar results GSB-5@2'MS and GSB-5@2'MSD. Results between the masked duplicate sample for groundwater (M-1GW) are comparable to the corresponding |
| Accuracy | No VOC contrasting at a vigan identified | sample result, TMW-1@4-9'. The matrix spike and matrix spike duplicate samples returned similar results TMW-2@4-9'MSD. |
| Accuracy | No VOC contaminants were identified in the equipment blank collected soil sampling equipment (EB-1S). | Sample TMW-2@4-9'MS and TMW-4-9'MSD were qualified for acetone due to high continuing calibration verification, and results may be biased |
| | No VOC contaminants were identified in the equipment blank sample collected for groundwater sampling equipment (EB-1GW) | slightly high. Conclusions are not affected since acetone was not detected in any other samples and is not a typical contaminant of concern. |
| | | Sample GSB-5@2' was qualified for 2-methylnaphthalene (2-MN) since the matrix spike recovery was high for the MSD sample. 2-methyl-naphthalene was identified in other soil samples, but results did not exceed GRCC. Therefore, conclusions drawn from 2-MN data are still valid. |
| Representativeness | Soil borings were advanced in their proposed locations, and all proposed borings and temporary monitoring wells were completed. | The samples submitted for analysis were extracted from the original samples following standard methods, and thus are representative. |
| Completeness | Temporary monitoring wells and soil borings were installed in their proposed locations, and all proposed borings were completed. | All of the analyses provided by the laboratory were determined to be complete. |
| Comparability | Field methods set forth in the Standard Operating Procedure were followed during field work, and therefore are comparable to one another. | The samples were analyzed following standard methods and thus are comparable to cleanup criteria and other samples from the project site. |

FIELD PROCEDURES

The Sampling Plan was prepared by Dean Hazle and reviewed by David Stegink. Field notes and chain of custody procedures (including hold times) and instrument calibration were reviewed for this data assessment.

Quality Assurance/Quality Control Samples

The QA/QC samples collected for this project are presented in the following table:

| Sample ID | Matrix | Туре |
|------------------|-------------|---|
| Methanol Blank | Methanol | A methanol blank was submitted for VOCs analysis. |
| Trip/Field Blank | Water | A trip/field blank of deionized water was prepared by |
| | | Fibertec, Inc. of Holt, Michigan (Fibertec), and submitted |
| | | for VOCs analysis. |
| Equipment Blank | Water | A rinsate sample (EB-1S) was collected from soil |
| | | sampling equipment and submitted for analysis of VOCs (USEPA 8260+) |
| | | A rinsate sample (EB-1GW) was collected from |
| | | groundwater sampling equipment and submitted for |
| | | analysis of VOCs (USEPA 8260+) |
| Masked Duplicate | Soil and | Masked Duplicate M-1S was collected for groundwater |
| | Groundwater | sample GSB-6@2' and submitted for analysis of VOCs |
| | | (USEPA 8260+), PNAs (USEPA 8270), MI 10 metals |
| | | Masked Duplicate M-1GW was collected for |
| | | groundwater sample TMW-1@4-9' and submitted for |
| | | analysis of VOCs (USEPA 8260+) |
| MS/MSD | Soil and | Matrix Spike and Matrix Spike Duplicate were collected |
| | Groundwater | for soil sample GSB-5@2', and submitted for analysis of |
| | | VOCs (USEPA 8260+), PNAs (USEPA 8270), MI 10 metals |
| | | Matrix Spike and Matrix Spike Duplicate were collected |
| | | for groundwater sample TMW-2@4-9, and submitted for |
| | | analysis of VOCs (USEPA 8260+) |

Methanol Blank

A methanol blank was submitted in order to evaluate the potential for VOC cross-contamination as a result of the methanol batch used in preparing soil sampling kits. No VOCs were identified above the reporting limit within the methanol blank sample. No concerns associated with potential cross-contamination as a result of the laboratory prepared methanol sampling vials were identified by the methanol blank analytical results.

Trip/Field Blank

A trip/field blank was prepared by Fibertec and carried in the sample cooler during the sampling activities. The trip blank was prepared in order to evaluate the potential for VOC cross-contamination due to field conditions. No VOCs were identified above the reporting limit within the trip blank sample. No concerns associated with potential cross-contamination as a result of field conditions were identified based upon the trip blank analytical results.

Equipment Blank

The purpose of the equipment blank sample was to evaluate the efficacy of decontamination procedures in preventing cross-contamination of aluminum between samples. Equipment rinsate samples were collected at the end of each sampling event.

Masked Duplicate Sample

The purpose of the masked duplicate sample was to evaluate the ability of the laboratory to replicate data. The masked duplicate for soil (M-1S) was collected at GSB-6@2'. The masked duplicate for groundwater M-1GW was collected immediately following the collection of TMW-1@4-9'.

Matrix Spike/Matrix Spike Duplicate

The purpose of the matrix spike and matrix spike duplicate samples was to evaluate the ability of the laboratory to identify a known quantity of standard above the sample matrix response, and ensure that the matrix response does not interfere with analytical results. The matrix spike and matrix spike duplicates for groundwater were collected from TMW-2@4-9. The matrix spike and matrix spike duplicates for soil were collected at GSB-5@2'. Additionally, the matrix spike and matrix spike duplicate samples evaluate the laboratory's ability to replicate data.

LABORATORY DATA

Fibertec provided a Quality Assurance Report for the trace metals laboratory batches. Envirologic conducted a comparative analysis of the matrix spike and matrix spike duplicate (MS/MSD) results. The purpose of MS/MSD samples is to verify the accuracy and precision of the laboratory operations and evaluate the impact of matrix effects (i.e., bias) on overall analytical performance.

DATA REDUCTION AND PROCESSING

Limited data reduction and processing was conducted. The field notes were composed by Field Geologist Robert Webster. The analytical laboratory data sheets were also reviewed and

reduced into a table for the Phase II ESA report by Dean Hazle, Project Geologist. The Phase II ESA report was reviewed by David Stegink.

STATISTICAL TEST

Statistical methods were used to evaluate the laboratory data. The first statistical analysis was the comparison of the actual reporting limit to the laboratory standard reporting limit. The second statistical analysis was the direct comparison of contaminant concentrations to the cleanup criteria. Conclusions can be drawn from a direct comparison of contaminant cleanup concentrations and thus further statistics were not employed to develop background concentrations.

CONCLUSIONS

All of the data collected have been verified and are valid to make decisions about the DQOs. The data presents conditions that would logically be expected based upon the identified site use history and previous results.